

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

FREEDOM FROM RELIGION  
FOUNDATION, INC.; ANNIE  
NICOL GAYLOR; ANNIE LAURIE  
GAYLOR; PAUL GAYLOR; DAN  
BARKER; PHYLLIS ROSE, and  
JILL DEAN,

Plaintiffs,

vs.

CASE NO.: 08-CV-588

PRESIDENT BARACK OBAMA;  
WHITE HOUSE PRESS SECRETARY  
ROBERT GIBBS; WISCONSIN  
GOVERNOR JIM DOYLE, and  
SHIRLEY DOBSON, CHAIRMAN OF  
THE NATIONAL DAY OF PRAYER  
TASK FORCE,

Defendants.

DEPOSITION OF SHIRLEY DOBSON

November 10, 2009

PURSUANT TO NOTICE, the deposition of SHIRLEY DOBSON was taken on behalf of the Plaintiffs, pursuant to Federal Rules of Civil Procedure, at 8605 Explorer Drive, Colorado Springs, Colorado, this date at 8:36 a.m., before Connie S. Dyke, RPR, CRR, and Notary Public.

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1 SHIRLEY DOBSON,

2 called as a witness, having been first duly sworn,  
3 testified as follows:

4 EXAMINATION

5 BY MR. BOLTON:

6 Q. Mrs. Dobson, you're currently the chairman or  
7 cochairman of the National Day of Prayer Task Force; is  
8 that correct?

9 A. Chairman.

10 Q. And you've held that position since 1991?

11 A. Correct.

12 Q. For convenience, when I refer to the "National  
13 Day of Prayer Task Force" throughout the deposition, I  
14 think I'm probably going to just try to refer to it as  
15 the task force for shorthand. Is that okay?

16 A. (Witness indicating in the affirmative.)

17 Q. Would it be fair to describe one of the goals  
18 of the task force is to encourage prayer?

19 A. Yes.

20 MR. THERIOT: Shirley, I should interject  
21 here. We didn't talk about this, but nodding your head  
22 doesn't work because she can't -- she does actually  
23 take that down, but it's better if you give a verbal  
24 answer.

25 THE WITNESS: Okay.

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1 Q. (BY MR. BOLTON) Has that always been one of  
2 the goals of the task force?

3 A. Yes.

4 Q. Were you involved in the establishment or the  
5 setting up of the task force?

6 A. No.

7 Q. Who was involved in the original formation of  
8 the task force?

9 A. It would be the National Prayer Committee with  
10 my approval.

11 Q. Say the name again.

12 A. The National Prayer Committee with my  
13 approval.

14 Q. With your approval, okay. And the task force  
15 was set up in 1988; is that correct?

16 A. That's correct.

17 Q. And when you say that it was set up by "the  
18 National Prayer Committee with your approval," what do  
19 you mean, first of all, by the description "with your  
20 approval"? What was your role in having approval?

21 A. Well, I would interview the candidates for the  
22 task force and approve them.

23 Q. Had the task force been created as an entity  
24 of that name at the time that you gave this approval to  
25 the people that you interviewed?

2 (Pages 2 to 5)

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1 A. I took over in 1991, and there was a task  
 2 force then, and it has grown under my leadership.  
 3 Q. Did you have any role in the task force prior  
 4 to 1991?  
 5 A. No.  
 6 Q. Did Mr. Dobson have any role in the task force  
 7 prior to 1991?  
 8 A. Not at all.  
 9 Q. Did Mr. Dobson have any role with the National  
 10 Prayer Committee?  
 11 A. No.  
 12 Q. Do you know how it came about that the prayer  
 13 committee undertook to set up the task force?  
 14 A. No, I don't know.  
 15 Q. Do you know anything about the history of the  
 16 task force prior to you becoming the chairman in  
 17 1991?  
 18 A. Not really.  
 19 Q. When the task force was originally  
 20 established, do you know where it was located?  
 21 A. Yes.  
 22 Q. Where was that?  
 23 A. In San Bernardino, California, under the  
 24 direction of Mrs. Vonette Bright.  
 25 Q. And when did it move to Colorado Springs?

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1 A. When I accepted the chairmanship.  
 2 Q. And it has been here ever since; is that  
 3 correct?  
 4 A. Correct.  
 5 Q. And it's located on the campus of Focus on the  
 6 Family; is that correct?  
 7 A. That's correct.  
 8 Q. When the task force was originally  
 9 established, did Focus on the Family provide any of the  
 10 start-up money for the task force?  
 11 A. The board did.  
 12 Q. Pardon me?  
 13 A. The Focus on the Family board did.  
 14 Q. You said the Focus on the Family board?  
 15 A. Yes.  
 16 Q. Meaning individual members of the Focus on the  
 17 Family board?  
 18 A. No. The whole board voted that when I took  
 19 over the chairmanship, that they would give me seed  
 20 money to get me started, which is not unusual. They  
 21 give seed money to several ministries to get them off  
 22 the ground.  
 23 Q. And do you know how much seed money was  
 24 given?  
 25 A. Yes.

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1 Q. How much?  
 2 A. First year, \$100,000; second year, \$50,000;  
 3 third year, \$25,000, and then I was on the -- the task  
 4 force was on their own.  
 5 Q. Has Focus on the Family continued since then  
 6 to make a decision to provide funding --  
 7 A. No.  
 8 Q. -- to the task force?  
 9 A. We're totally on our own.  
 10 MR. THERIOT: One more thing. We didn't talk  
 11 about this either, but you should wait until he  
 12 finishes asking his question so you know exactly what  
 13 he's asking before you answer.  
 14 Q. (BY MR. BOLTON) When you took over as chairman  
 15 of the task force in 1991, I assume that you were  
 16 previously familiar with the task force; is that  
 17 correct?  
 18 A. Yes.  
 19 Q. And when did you become aware of the task  
 20 force?  
 21 A. I would say 1988.  
 22 Q. And how did you become aware?  
 23 A. Mrs. Bright asked me if I would be her  
 24 cochairman.  
 25 Q. And what did you say?

Page 9

1 A. I said I would pray about it and talk to my  
 2 husband and get back to her.  
 3 Q. And did you?  
 4 A. Yes.  
 5 Q. And what was your response?  
 6 A. I accepted it.  
 7 Q. Okay. And that was in 1991?  
 8 A. No. When I became her cochairman was in  
 9 1989.  
 10 Q. I'm sorry. So you became the chairman in  
 11 1991, but you were a cochair beginning in 1989?  
 12 A. That's correct.  
 13 Q. And at that point, the task force had already  
 14 been established as an entity; is that correct?  
 15 A. Small task force.  
 16 Q. And prior to becoming the cochair in 1989,  
 17 what did you learn about the origin and purposes for  
 18 the task force?  
 19 MR. ROSENBERG: Object as to form.  
 20 Q. (BY MR. BOLTON) Let me rephrase the question.  
 21 Had you learned anything about the history of the task  
 22 force and how it came about prior to becoming the  
 23 cochair in 1989?  
 24 A. No.  
 25 Q. You knew nothing about it?

3 (Pages 6 to 9)

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1 A. Not before I became cochair.  
 2 Q. When Mrs. Bright asked you in 1988 if you  
 3 would be a cochair, did she tell you anything about the  
 4 task force?

5 A. Not really about the task force. We talked  
 6 about the need for prayer in our country.

7 Q. And did you have any understanding that the  
 8 task force was to play a role in encouraging prayer in  
 9 our nation?

10 A. Yes.

11 Q. And what did you understand at least the  
 12 original intended role was?

13 A. To help promote and publicize prayer in our  
 14 nation on the National Day of Prayer.

15 Q. Now, obviously you consider prayer to be  
 16 important not just on the National Day of Prayer,  
 17 correct?

18 A. Correct.

19 Q. The task force, as you understood it, was to  
 20 promote and encourage the role of prayer mobilizing  
 21 around the National Day of Prayer?

22 A. Correct.

23 Q. What is your understanding as to why prayer is  
 24 important?

25 A. Well, we base it on the scripture which says

Page 11

1 that, "Blessed is the nation whose God is the Lord,"  
 2 and prayer is powerful. It moves the heart and the  
 3 hand of God. It brings blessing and protection on the  
 4 nation.

5 Q. Do you understand the United States to be a  
 6 Christian nation?

7 A. It was founded on the Judeo-Christian system  
 8 of values.

9 Q. And are those values incorporated into our  
 10 government then?

11 A. I don't know.

12 Q. Do you believe that there is a role for our  
 13 public officials to promote and encourage prayer?

14 A. I have no idea how they feel about it.

15 Q. Do you believe that that is an appropriate  
 16 role for public officials?

17 A. No, I think it's optional. It's up to them.

18 Q. When you talk about the role of prayer in our  
 19 nation, is it a particular type of prayer that you  
 20 believe is important?

21 A. This country was founded -- it was birthed in  
 22 prayer and founded on the God of the Bible, on His  
 23 biblical principles and His moral values and the  
 24 Judeo-Christian system of values. So our particular  
 25 task force is the expression -- the Judeo-Christian

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1 expression of the National Day of Prayer. Other faiths  
 2 may have their own expression. This is how we  
 3 celebrate the National Day of Prayer.

4 Q. And that would be the position of the task  
 5 force, not just your personal position, correct?

6 A. That's right.

7 Q. And when you say "birthed in prayer" in regard  
 8 to the origin of our nation, what do you mean by  
 9 that?

10 A. Well, our founding fathers that came over here  
 11 and the people that came over here from England, if you  
 12 look in the history, there was much prayer before they  
 13 came. And when they came and landed safely, the first  
 14 thing they did was pray.

15 Q. And it was Christian prayer?

16 A. I don't know what kind of prayer it was.

17 Q. When you say that the role of prayer in our  
 18 country needs to be -- and I'll talk about back in the  
 19 formative years of 1989 for the task force -- that the  
 20 role of prayer in our nation needed to be promoted and  
 21 encouraged; is that fair?

22 A. In 1952, under President Truman, he signed a  
 23 resolution with both houses of Congress, signed into  
 24 law, that we would have a National Day of Prayer. And  
 25 then in 1988, under President Ronald Reagan, he signed

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1 into law that the first Thursday would be our National  
 2 Day of Prayer. So we are celebrating the National Day  
 3 of Prayer, that's what our event is on that day, and  
 4 then we encourage prayer throughout the year.

5 Q. And what do you understand is the value of  
 6 prayer in terms of our nation?

7 A. Prayer, I believe, is putting a protective  
 8 covering over our nation.

9 Q. A protective what?

10 A. Covering over our nation. In Psalms, it says,  
 11 "The shields of the earth belong to the Lord." So it  
 12 is God that protects us and blesses us, and we believe  
 13 that prayer plays a large part in that.

14 Q. Now, in regard to the National Day of Prayer  
 15 itself, do you have any understanding that it is  
 16 intended to promote any particular viewpoint or type of  
 17 prayer?

18 MR. THERIOT: Objection, calls for  
 19 speculation. You may answer.

20 MR. ROSENBERG: Objection as to form.

21 Q. (BY MR. BOLTON) You can answer that.

22 A. Can you restate it?

23 Q. The National Day of Prayer itself, not the  
 24 task force, do you have any understanding that the  
 25 designated day is intended to promote any particular

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1 form of prayer?

2 A. No. Congress set aside this day for the  
3 American people of all faiths, and all faiths are  
4 encouraged to pray in their own tradition.

5 Q. Your particular organization, the task force,  
6 though, is encouraging prayer based on the  
7 Christian-Judeo precepts; is that correct?

8 A. We are the expression of the  
9 Judeo-Christian -- I mean, we are the Judeo-Christian  
10 expression of the National Day of Prayer.

11 Q. Is it fair to say that the task force's  
12 position is that not all prayer, from the perspective  
13 of the task force, is fungible or interchangeable? The  
14 prayer that you're promoting, you're promoting as an  
15 alternative or in preference to other types of prayer  
16 for other religions; is that correct?

17 MR. THERIOT: Objection as to form, vague.

18 MR. ROSENBERG: Objection.

19 Q. (BY MR. BOLTON) Do you consider prayer to be  
20 fungible? Do you understand what I mean by that?

21 A. No.

22 Q. Is all prayer the same?

23 A. God has to be the judge of that.

24 Q. Do you believe that all prayer is the same?

25 A. Well, as I said, our expression is the

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1 Judeo-Christian, so we pray to the God of the Bible.

2 Q. And based on your beliefs, that is the correct  
3 God that you believe in and the God that should be  
4 prayed to; is that correct?

5 A. That's my belief.

6 Q. With regard to the National Day of Prayer Task  
7 Force, were you at all involved in the naming of the  
8 organization?

9 A. No.

10 Q. Certainly there's nothing in the name of the  
11 entity itself, National Day of Prayer Task Force, that  
12 would indicate the organization's expression of the  
13 Christian-Judeo point of view; is that correct?

14 MR. THERIOT: Objection, calls for  
15 speculation. You may answer.

16 A. Can you restate the question?

17 Q. (BY MR. BOLTON) Is there anything in the  
18 National Day of Prayer Task Force, in the name of the  
19 entity, that would indicate the Christian-Judeo  
20 perspective that the task force holds?

21 A. On our Website.

22 Q. Pardon me?

23 A. I think it does on our Website, that we are  
24 the Judeo-Christian expression of the National Day of  
25 Prayer.

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1 Q. Just the title itself, though, if I don't go  
2 to your Website and just hear National Day of Prayer  
3 Task Force, there's nothing that would alert me to the  
4 Christian-Judeo orientation of the organization,  
5 correct?

6 A. I don't know how a person would see that.

7 Q. With regard to the phrase "task force," do you  
8 have any understanding of how that -- well, let me ask  
9 more broadly. Do you know how the naming of the  
10 organization, National Day of Prayer Task Force, came  
11 about?

12 MR. THERIOT: Objection, asked and answered.  
13 You can answer.

14 A. Probably through the National Prayer  
15 Committee.

16 Q. (BY MR. BOLTON) More specifically, though, do  
17 you know how the particular words to name the entity  
18 were selected?

19 A. Well, the employees that worked for National  
20 Day of Prayer, you wouldn't call it National Day of  
21 Prayer employees, so you call it a task force.

22 Q. And what is your understanding of what a task  
23 force is?

24 A. We promote and publicize and provide resources  
25 to constituents to help them celebrate the National Day

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1 of Prayer if they ask for it, if they call and ask for  
2 resources.

3 Q. Is that how you would describe then the task  
4 that is being described in the title?

5 A. Well, the task force has many tasks. That is  
6 just a few of them.

7 Q. What are the other tasks of the task force?

8 A. We have state coordinators and regional  
9 coordinators, and they help them set up their events,  
10 if they need help, if they need promotional  
11 materials.

12 Q. Now, obviously, the promotion, encouragement  
13 of prayer, could be done year-round, correct?

14 A. Correct.

15 Q. And it can be done without reference to a  
16 particular day designated by the President; is that  
17 correct?

18 A. That's correct.

19 Q. Is it advantageous to the task force to have  
20 the connection to the designated day of prayer in terms  
21 of promoting and encouraging prayer?

22 MR. THERIOT: Objection, vague. You may  
23 answer, if you can.

24 A. Can you restate the question?

25 Q. (BY MR. BOLTON) Does the connection to the

5 (Pages 14 to 17)



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1 National Day of Prayer provide any benefits to the task  
2 force in promoting and encouraging prayer?

3 A. We believe that prayer should be 365 days a  
4 year, but the National Day of Prayer has been set aside  
5 by Congress, and we believe that on this day we should  
6 gather as to however anybody wants to gather, and that  
7 we should celebrate the National Day of Prayer. We  
8 encourage all Americans to pray according to their  
9 faith. Muslims could have a National Day of Prayer  
10 Task Force, the Hindus can have a National Day of  
11 Prayer Task Force, and the Christians can have a

12 National Day of Prayer Task Force. That's what our  
13 expression is.

14 Q. And is that expression that the task force --

15 A. Judeo-Christian expression, yes.

16 Q. And these other religions you talked about,  
17 those are not promoted by the task force?

18 A. We are a privately funded 501(c)(3). Our  
19 volunteers and constituents are of that persuasion, and  
20 so we -- that's our expression of the National Day of  
21 Prayer, but we don't exclude any other faith from  
22 joining us.

23 Q. Does the government support for the National  
24 Day of Prayer, is it helpful to the task force in terms  
25 of adding prestige to your effort?

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1 MR. ROSENBERG: Objection, referring to what  
2 the government support is, if there's any at all.

3 A. There's not any government support other than  
4 participation, if they choose to participate.

5 Q. (BY MR. BOLTON) Do you believe that government  
6 participation in National Day of Prayer activities  
7 facilitates the task force in its endeavors?

8 A. The scriptures say, in 1 Timothy 2, that we're  
9 to pray for all kings and all those in authority, that  
10 we may lead a peaceful and quiet and godly life. So,  
11 yes, I think it's beneficial if members of government  
12 participate, but that is totally up to them.

13 Q. And it adds a certain element of credibility  
14 to the endeavors of the task force, correct?

15 MR. THERIOT: Objection, calls for  
16 speculation.

17 MR. ROSENBERG: And as to form.

18 A. I don't know.

19 Q. (BY MR. BOLTON) But you have said that you  
20 believe it adds credibility, correct?

21 A. I didn't say that.

22 Q. I'm asking a question. Do you believe it adds  
23 credibility to the task force?

24 A. I don't know.

25 Q. Do you believe it adds prestige to the task

Page 20

1 force?

2 MR. THERIOT: Objection, calls for  
3 speculation.

4 MR. ROSENBERG: And same objection. I don't  
5 know what "it" is.

6 Q. (BY MR. BOLTON) Can you answer the question?

7 A. I don't know.

8 MR. THERIOT: You don't know the answer to the  
9 question, or you can't answer the question? I'm  
10 sorry.

11 MR. BOLTON: I had the same question in my  
12 mind.

13 MR. THERIOT: You don't know the answer to the  
14 question, is that what you're saying?

15 A. I don't know how that's seen.

16 Q. (BY MR. BOLTON) Certainly the task force  
17 encourages the participation of government officials in  
18 National Day of Prayer activities, correct?

19 A. We have an initiative that we pray for the  
20 seven centers of power, and that is the government, the  
21 military, the media, business, education, family and  
22 church. And so on the National Day of Prayer, we pray  
23 for all of those centers of power, and government is  
24 one of them.

25 Q. In addition to praying for government, though,

Page 21

1 do you encourage participation of government officials  
2 in the various activities that you organize?

3 A. We hope they'll participate.

4 Q. But you do more than just leave it to hope,  
5 correct?

6 A. We write them requesting a proclamation for  
7 the National Day of Prayer, but there's no demand put  
8 on them.

9 Q. Whether there's a demand or not, though, you  
10 certainly seek out participation by the President and  
11 by governors to issue proclamations, correct?

12 MR. THERIOT: Objection, vague as to the  
13 meaning of "participation." You may answer it.

14 THE WITNESS: Can I say something off the  
15 record? Is that allowable?

16 MR. THERIOT: No. When we take a break, we  
17 can talk.

18 A. Do you want to restate the question?

19 Q. (BY MR. BOLTON) There are no secrets on the  
20 record.

21 A. No. I was going to ask everybody the  
22 question. Do you want to restate that question,  
23 please?

24 MR. BOLTON: Can you read the question back?  
25 (The requested question was read back by the

6 (Pages 18 to 21)

Page 22

1 reporter.)  
 2 A. I would say yes.  
 3 Q. (BY MR. BOLTON) And the task force also at  
 4 least attempts to get additional participation by  
 5 government officials in the activities that the task  
 6 force organizes; is that correct?  
 7 A. We hope that they will participate. This day  
 8 is set aside to pray for America and its leaders, and  
 9 since government is in the role of leadership, we hope  
 10 they will participate. It sets a good example for the  
 11 nation.  
 12 Q. And do you just sit back and see if it  
 13 happens, or does the task force actually undertake to  
 14 obtain such participation from government officials?  
 15 A. We write a letter requesting a proclamation,  
 16 and then there's one follow-up visit from the state  
 17 coordinator of that governor to the office to see if he  
 18 is going to write a proclamation. Some do and some  
 19 don't.  
 20 Q. Recently all the governors have been issuing  
 21 proclamations; is that correct?  
 22 A. Yes. That's wonderful.  
 23 Q. And was that the case before you became the  
 24 chairman of the task force?  
 25 A. No. Under my leadership -- and I take no

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1 credit for this. God has really blessed the efforts of  
 2 the National Day of Prayer, so I think more people know  
 3 about it. I think in the times that we're living, we  
 4 see a great need for prayer, and I think our leaders  
 5 see that also.  
 6 Q. Do you believe the task force has been  
 7 influential in this growth in government officials'  
 8 participation in National Day of Prayer activities?  
 9 MR. ROSENBERG: Objection.  
 10 A. I don't see how, because we just write a  
 11 letter requesting a proclamation.  
 12 Q. (BY MR. BOLTON) It must be a really good  
 13 letter. Who writes the letter?  
 14 A. I have help. We have an organization here  
 15 called Master Writers, and I work with them in crafting  
 16 the letter.  
 17 Q. And you work with them directly?  
 18 A. Yes.  
 19 Q. And the letters that you're talking about, are  
 20 they letters that are signed by yourself?  
 21 A. Yes.  
 22 Q. And then the state coordinators then follow up  
 23 with government officials trying to encourage  
 24 participation; is that correct?  
 25 A. One follow-up.

Page 24

1 MR. ROSENBERG: Objection again.  
 2 Q. (BY MR. BOLTON) One follow-up with the  
 3 governor, correct?  
 4 A. Well, they usually don't get to see the  
 5 governor. They see his scheduler or his aide or  
 6 whatever you call it, but they don't -- I don't know of  
 7 anybody that's gotten -- well, maybe some have, but I  
 8 can't give a name of anybody that sat down with the  
 9 governor and said, Would you write a proclamation?  
 10 It's like the President. You don't get that far.  
 11 Q. Now, the letter that you prepare with Master  
 12 Writers, do you send that letter also to local  
 13 government officials?  
 14 A. No.  
 15 Q. Is there any effort by the task force to  
 16 involve local government officials in National Day of  
 17 Prayer activities?  
 18 A. All of our workers are volunteers,  
 19 coordinators are volunteers. They're not paid. We  
 20 have state coordinators that are volunteers, and we  
 21 have regional coordinators that are volunteers. So  
 22 some of the regional volunteers may ask the mayor or  
 23 the city council members or school board members if  
 24 they would like to participate in the National Day of  
 25 Prayer, but I have nothing to do with that.

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1 Q. But they do it under the auspices of the task  
 2 force though, correct?  
 3 MR. THERIOT: Objection, calls for  
 4 speculation.  
 5 A. I don't know.  
 6 Q. (BY MR. BOLTON) You've got state coordinators  
 7 and then regional coordinators?  
 8 A. Yes.  
 9 Q. A regional coordinator, is that a broader  
 10 geographic scope than a state, or is it regional within  
 11 the states?  
 12 A. It's regional within the states. Usually  
 13 communities, cities.  
 14 Q. When you began as the cochair in 1989, how  
 15 many employees were there of the task force?  
 16 A. Well, Campus Crusade for Christ is a ministry  
 17 of Dr. Bill and Vonette Bright, so they used a lot of  
 18 their staff, I'm sure, to help -- as part of the task  
 19 force to help promote the National Day of Prayer. So I  
 20 don't really know how many.  
 21 Q. The task force does at the present time have  
 22 full-time employees, correct?  
 23 A. That's correct.  
 24 Q. Do you know about how many full-time employees  
 25 the task force has at this time?

7 (Pages 22 to 25)

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1 A. I think we have about ten.  
 2 Q. And they are full-time?  
 3 A. I think we have one part-time.  
 4 Q. And then in 2009, you would have had one state  
 5 coordinator for each state, correct?  
 6 A. I'm not sure, because they kind of come and  
 7 go. So we have somebody that's over the state  
 8 coordinators, and she would be able to tell you that.  
 9 Q. Do you know how many volunteers altogether,  
 10 approximate number of volunteers, you had acting on  
 11 behalf of the task force in respect to the 2009

12 National Day of Prayer?

13 A. We have no idea how many people are actually  
 14 planning an event on the National Day of Prayer. For  
 15 instance, I know of a lady that invited six of her  
 16 friends to get in her van on the National Day of Prayer  
 17 and they went to the police department, fire  
 18 department, the school board, the mayor's office, and  
 19 at each place they stopped and prayed for them. So  
 20 those kind of things are generally not reported, but I  
 21 would say probably we have between 30- to 40,000 prayer  
 22 gatherings across the nation. And as I said, many of  
 23 them -- many churches don't report that they've  
 24 celebrated the National Day of Prayer. We have no  
 25 idea.

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1 Q. Are the state coordinators encouraged to  
 2 organize activities in the state capitols in which they  
 3 operate?

4 A. That's up to them.

5 Q. Are they encouraged to organize activities in  
 6 the state capitols?

7 A. If there are other events on the state capitol  
 8 steps, some choose to have their event there. Some  
 9 choose to have them in the state parks, churches,  
 10 homes.

11 Q. A statehouse, is that a preferred location for  
 12 activities, if it can be done?

13 A. Some feel like -- some coordinators may feel  
 14 like it is and some may feel like it's not.

15 Q. In 2009, do you know how many National Day of  
 16 Prayer activities occurred at statehouses?

17 A. I have no idea.

18 Q. Well, you do know, in addition to presidential  
 19 and gubernatorial proclamations, that some local  
 20 officials now also issue proclamations, correct?

21 A. I've heard that.

22 Q. Who did you hear that from?

23 A. It's just been rumored. I mean, I've heard  
 24 that some mayors do. I couldn't give you a name. They  
 25 typically don't send the proclamation to us. We never

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1 see them.

2 Q. But you do know as a fact, though, that there  
 3 are additional proclamations issued at lower government  
 4 levels than just the president and the governor levels,  
 5 correct?

6 A. I really don't know.

7 Q. With regard to the proclamations issued by the  
 8 governors, my understanding is that in 2009 and in at  
 9 least 2008, all the governors issued proclamations.

10 A. That's correct.

11 Q. And all of those proclamations designated a  
 12 day of prayer, correct?

13 A. Yes.

14 Q. And all of them designated a National Day of  
 15 Prayer that has been set aside by the President; is  
 16 that correct?

17 A. That's correct.

18 Q. And, in fact, the task force encourages the  
 19 governors to designate the same day as a day of prayer  
 20 as the date set aside by the President, correct?

21 A. We request it.

22 Q. In 1988, President Reagan signed a law whereby  
 23 the President is required to designate the first  
 24 Thursday in May of each year as the National Day of  
 25 Prayer; is that correct?

Page 29

1 A. He signed in law that the first Thursday of  
 2 May would be our nation's day of prayer, our National  
 3 Day of Prayer, and he encouraged people of all faiths  
 4 to participate in it.

5 Q. The encouragement of all faiths to participate  
 6 in it, that wasn't part of the law that he signed,  
 7 though; is that correct?

8 A. I don't remember what the law said. I would  
 9 have to have somebody read it to me.

10 Q. But, basically, it was from that point forward  
 11 that there became a predictable date each year for the  
 12 National Day of Prayer, correct?

13 A. Correct.

14 Q. Prior to that, the presidents were required to  
 15 declare a National Day of Prayer after 1952 going  
 16 forward, but no one knew exactly when it was going to  
 17 be until the President actually did it, correct?

18 A. Correct.

19 Q. Having a predictable date makes it easier to  
 20 organize activities in respect to the National Day of  
 21 Prayer; is that correct?

22 A. Yes.

23 Q. For instance, a task force like yours would  
 24 have trouble mobilizing the support for the National  
 25 Day of Prayer if you didn't know well in advance when

8 (Pages 26 to 29)



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1 it was going to be, correct?  
 2 A. Correct.  
 3 Q. The task force was created in 1988. Was it  
 4 created before or after President Reagan signed into  
 5 law the requirement that it be on the first Thursday in  
 6 May?  
 7 A. I don't know. I wasn't part of it then.  
 8 Q. Were you at all aware that the creation of a  
 9 task force was being discussed prior to its actual  
 10 formation?  
 11 A. No.  
 12 MR. THERIOT: Objection, vague.  
 13 A. No.  
 14 Q. (BY MR. BOLTON) Did you have any involvement  
 15 personally in lobbying for having a date certain  
 16 specified for the National Day of Prayer?  
 17 A. No.  
 18 Q. Was Mr. Dobson involved in any such effort?  
 19 A. No.  
 20 Q. Was anyone involved in such an effort that you  
 21 knew?  
 22 A. Yes.  
 23 Q. Who?  
 24 A. Mrs. Vonette Bright.  
 25 Q. Mrs. Bright?

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1 A. Mrs. Vonette Bright.  
 2 Q. And how do you know that?  
 3 A. Because she told me. She told me how the day  
 4 came about, the first Thursday of May.  
 5 Q. And what did she tell you specifically?  
 6 A. Well, she told me that she got up at 5 in the  
 7 morning.  
 8 Q. She told you what?  
 9 A. She got up at 5 in the morning -- she lives in  
 10 California -- and she called a couple of congressmen  
 11 and there was a rabbi involved, and they began to talk  
 12 about the possibility of setting a day for the National  
 13 Day of Prayer. And so I guess -- I don't know, but  
 14 perhaps a committee was formed and it came out of  
 15 that.  
 16 Q. And do you know the names of any of the  
 17 congressional officials that she contacted?  
 18 A. I don't recall that.  
 19 Q. Was Strom Thurmond one of the backers of that  
 20 legislation?  
 21 A. I don't recall.  
 22 Q. So did she tell you why she was actively  
 23 trying to get such legislation passed?  
 24 A. Well, of course, I'm sure she believed in the  
 25 power of prayer, she believed that we should have a day

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1 in this country where we cover this nation in prayer  
 2 and the leaders. That was her heart, and she wanted to  
 3 help facilitate that, if it was possible.  
 4 Q. But there already was a requirement that there  
 5 be a day of prayer designated by the President, it just  
 6 wasn't precise when it would be; is that correct?  
 7 A. That's correct.  
 8 Q. Did she tell you why she wanted to have a date  
 9 certain specified?  
 10 A. No.  
 11 Q. When did she tell you about her efforts?  
 12 A. Well, she told me in 1988 when I became  
 13 cochairman. But she also at various times, since she  
 14 is the cochairman, speaks on behalf of the National Day  
 15 of Prayer and just gives the history on how the day was  
 16 set.  
 17 Q. Were you aware, prior to being told by  
 18 Mrs. Bright, that the President had set this particular  
 19 day? Were you aware of that legislation having been  
 20 signed by the President?  
 21 A. I was not.  
 22 Q. The National Prayer Committee, what is your  
 23 understanding of what that entity is?  
 24 A. Well, first of all, I am -- I guess I would  
 25 say that I am the name, the voice and the face of the

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1 National Day of Prayer. I'm the visible one for the  
 2 National Day of Prayer Task Force. I don't really have  
 3 a lot of knowledge about how the National Prayer  
 4 Committee came together. You would have to really ask  
 5 the chairman. I'm sorry. He's called the president,  
 6 not the chairman.  
 7 Q. Pardon me?  
 8 A. The president, David Butts, B-u-t-t-s.  
 9 Q. And he's the president of the National Prayer  
 10 Committee?  
 11 A. David Butts.  
 12 Q. And you said the title is president of the  
 13 National Prayer Committee?  
 14 A. National Prayer Committee, yes.  
 15 Q. And how long has he been the president?  
 16 A. I don't know.  
 17 Q. As long as you can remember? I mean, it's not  
 18 just --  
 19 A. No, there's been other presidents.  
 20 Q. Okay. And are you telling me, in terms of the  
 21 National Prayer Committee, at least just in a general  
 22 sense, what it is and what it does, you do not have any  
 23 knowledge?  
 24 A. I know it's made up of different prayer  
 25 ministries, people that have different prayer

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1 ministries, and those people are listed on the back of  
2 our letterhead, because we're accountable to the  
3 National Prayer Committee.

4 Q. And the National Prayer Committee was formed  
5 in 1982; is that correct?

6 A. I'm not sure.

7 Q. Do you know whether it was formed relatively  
8 close in time to when the task force was set up?

9 A. I don't know.

10 Q. Does it have any purpose? Do you know,  
11 generally, what the purpose of the National Prayer  
12 Committee is?

13 A. I'm sure they have a purpose statement. I  
14 haven't read it.

15 Q. If somebody asked you outside of a deposition  
16 room what the purpose of the National Prayer Committee  
17 is, would you have any at least a general answer that  
18 you could give them?

19 A. I would think it would be to mobilize prayer.  
20 We are a project of the National Prayer Committee, but  
21 also the global day of prayer is a project of the  
22 National Prayer Committee, and they have other projects  
23 to mobilize prayer.

24 Q. Now, when you say the task force is a product  
25 of the prayer committee, what do you mean by that?

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1 A. We're accountable to them. We're not a  
2 product. We're actually a project, j-e-c-t.

3 Q. Product? I'm not hearing you. I'm sorry.

4 A. A project.

5 Q. Okay. A project?

6 A. Not a product but a project.

7 Q. Project, okay. But in terms of the  
8 organization of the task force, that was accomplished  
9 by the prayer committee though; is that correct?

10 A. I'm not clear on your question.

11 Q. Well, when you say that you're a project of  
12 the prayer committee, what do you mean by that?

13 A. Well, we're accountable to them. We're under  
14 them. They're an umbrella for us.

15 Q. So ultimately as the chairman of the task  
16 force, you are accountable to the prayer committee; is  
17 that correct?

18 A. That's correct.

19 Q. Are there other entities that are accountable  
20 to the prayer committee?

21 A. I'm not aware of them. They have other  
22 projects.

23 Q. And in terms of the accountability that the  
24 task force has to the prayer committee, is that  
25 something that's specified in the organizational setup

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1 of the task force?

2 A. I haven't seen that. I haven't seen any  
3 paperwork on that.

4 Q. You just understand it to be the case?

5 A. Yes.

6 Q. You haven't seen bylaws or anything like that?  
7 Does the task force have bylaws?

8 MR. ROSENBERG: Object as to form. It's  
9 compound.

10 A. You would have to ask the executive director  
11 of the task force.

12 Q. (BY MR. BOLTON) You've never seen bylaws for  
13 the task force; is that correct?

14 A. I've seen a lot of paperwork. I don't  
15 remember.

16 Q. In any event, your working understanding is  
17 that the task force is accountable to the prayer  
18 committee, correct?

19 A. Correct.

20 Q. In practice, what does that mean? How do they  
21 hold you accountable?

22 A. Well, all of our funds are -- we have a CPA,  
23 and so all of our funds are looked at, and, of course,  
24 they meet with us once a year and keep in contact with  
25 us through e-mails and phone calls, and I imagine if we

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1 are not following the Judeo-Christian expression of the  
2 National Day of Prayer, they would -- they could really  
3 fire us, I guess. I don't take a salary. I volunteer  
4 my time, but I imagine they could just dissolve the  
5 task force.

6 Q. So you understand the prayer committee to  
7 adhere to the Judeo-Christian orientation that you've  
8 described as the task force also adhering to; is that  
9 correct?

10 A. That's correct.

11 Q. Mission America, is that a name that you're  
12 familiar with?

13 A. Yes.

14 Q. What is Mission America?

15 A. I don't know. I know it's a prayer -- you  
16 know, it's a prayer ministry, but I don't know a lot  
17 about it. I know it's a project -- it's another  
18 project of -- I mean, I don't know if it's a project of  
19 the National Prayer Committee, but I know that the  
20 person that's in charge of it is a member of the  
21 National Prayer Committee.

22 Q. The person in charge of Mission America is a  
23 board member of the prayer committee?

24 A. I don't know that he's -- they have an  
25 executive board. I don't know that he's a board

10 (Pages 34 to 37)

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1 member.  
 2 Q. In any event, there is a relationship then  
 3 between Mission America and the prayer committee, to  
 4 your understanding?  
 5 A. I don't know.  
 6 Q. Do you know why the prayer committee was  
 7 established?  
 8 A. The National Prayer Committee?  
 9 Q. Right, the National Prayer Committee.  
 10 A. I don't have an understanding of that. That  
 11 was before my time.  
 12 Q. And the origin of the National Prayer  
 13 Committee is not something that you learned of  
 14 subsequent to its creation? In other words, you said  
 15 you weren't there at the time. Obviously, you know  
 16 things that you weren't necessarily there to witness,  
 17 correct?  
 18 A. I don't recall.  
 19 Q. In terms of the National Day of Prayer Task  
 20 Force, you made reference to an executive director.  
 21 A. Yes.  
 22 Q. And who is the executive director of the task  
 23 force?  
 24 A. John Bornschein.  
 25 Q. And what is the role of the executive

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1 director?  
 2 A. He actually runs the administrative part of  
 3 the task force.  
 4 Q. You have people that are involved in media and  
 5 marketing; is that correct?  
 6 A. Correct.  
 7 Q. How many people do you have that perform that  
 8 function for the task force?  
 9 A. Two.  
 10 Q. And are they currently Becky Armstrong and  
 11 Jamie Staler?  
 12 A. Correct.  
 13 Q. And what is their function? What do they do  
 14 for the task force?  
 15 A. Becky is part-time, Jamie is full-time, and  
 16 they -- if they have anyone -- any of the media calling  
 17 for an interview from me, they set that up. They help  
 18 with our catalogs, with our promotional efforts, radio  
 19 spots.  
 20 Q. And do they prepare press releases?  
 21 A. Yes.  
 22 Q. And when the task force issues a press  
 23 release, do they have an inventory of media that they  
 24 send their press releases to?  
 25 A. Yes.

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1 Q. Do you know about how many outlets they send  
 2 their press releases to?  
 3 A. I have no idea.  
 4 Q. Is it quite a few?  
 5 MR. ROSENBERG: Objection.  
 6 Q. (BY MR. BOLTON) You just have no idea at  
 7 all?  
 8 A. I can't speculate on that.  
 9 Q. Does the task force have -- you've got,  
 10 roughly, ten employees at this point, correct?  
 11 A. Uh-huh.  
 12 Q. And you've got a large number of volunteers  
 13 that work at the state and regional levels?  
 14 A. That's correct. And some volunteers that  
 15 aren't connected with the state or the regional. I  
 16 mean, they are just moms and pastors and whoever wants  
 17 to plan an event for the National Day of Prayer.  
 18 Q. You don't have members, correct?  
 19 A. No. They're all volunteers.  
 20 Q. Do you have any sort of a list of people that  
 21 the task force regularly sends out by e-mail updates on  
 22 what the task force is doing, sort of a web list?  
 23 A. Yes, we have a -- I would say a Christian  
 24 constituent base.  
 25 Q. And what does that mean?

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1 A. People that -- well, we are privately funded,  
 2 people that give, we have donors that give to the  
 3 efforts of the National Day of Prayer Task Force, and  
 4 we have many people that want to receive our mailings.  
 5 They are constituents. Just like any ministry,  
 6 National Day of Prayer is a ministry. We see it as a  
 7 ministry to the nation.  
 8 Q. Does the task force maintain a list of such  
 9 people that it regularly communicates with by e-mail?  
 10 A. Yes.  
 11 Q. And do you know about how many people are on  
 12 that list?  
 13 A. I don't.  
 14 Q. Does the task force prepare a newsletter?  
 15 A. Yes.  
 16 Q. And how often is the newsletter prepared?  
 17 A. I think we send it out three times a year.  
 18 It's an update.  
 19 Q. And is that a hard copy, or is that sent  
 20 electronically to the people that it's distributed  
 21 to?  
 22 A. I know we send out hard copies. I'm not sure  
 23 about the electronics part of it. You would have to  
 24 check with the executive director.  
 25 Q. Do you know, approximately, what your current

11 (Pages 38 to 41)

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<p>1 circulation is for the newsletter?</p> <p>2 A. You would have to ask the executive director.</p> <p>3 Q. Is it fair to say that you don't have any idea</p> <p>4 what the --</p> <p>5 A. I don't, because I'm not really -- you know,</p> <p>6 as I said, I'm the name, the face and the voice. I</p> <p>7 don't handle the administrative part of the office.</p> <p>8 I'm the visible face I guess you would say.</p> <p>9 Q. And about how much time do you spend on</p> <p>10 National Day of Prayer Task Force activities?</p> <p>11 A. Well, I'm a volunteer, so I always attend the</p> <p>12 managers' meetings to get an update. And mostly it's</p> <p>13 by e-mail. If they need to meet with them, I'm always</p> <p>14 available. I would say not a lot.</p> <p>15 Q. Is it less than when you began as the chair in</p> <p>16 1991?</p> <p>17 A. Yes.</p> <p>18 Q. When you began in 1991, was it pretty much a</p> <p>19 full-time job initially?</p> <p>20 A. Pretty much.</p> <p>21 Q. And how long did it remain pretty much a</p> <p>22 full-time job?</p> <p>23 A. Well, as the task force grew, it lightened my</p> <p>24 load.</p> <p>25 Q. It what?</p>	<p>1 A. No. We are housed here, but we pay for all</p> <p>2 the services that Focus provides for us. We pay for</p> <p>3 broadcast time, we pay for print. Whatever services,</p> <p>4 they bill us. They're just like a vendor, and so we</p> <p>5 pay for their services. So we're just housed here, but</p> <p>6 we're not part of Focus on the Family.</p> <p>7 Q. Has that vendor relationship always existed</p> <p>8 since the task force has been located in the Focus on</p> <p>9 the Family offices?</p> <p>10 A. I don't recall. That's 20 years ago.</p> <p>11 Q. In terms of the billing arrangements, is the</p> <p>12 task force billed on an annual basis or a monthly</p> <p>13 basis?</p> <p>14 A. Annual.</p> <p>15 Q. And for those sorts of services and space</p> <p>16 provided by Focus on the Family, do you know what yo</p> <p>17 were billed or what the task force was billed --</p> <p>18 A. You would have to ask the executive</p> <p>19 director.</p> <p>20 Q. Is it fair to say that you don't know?</p> <p>21 A. I don't know for sure what the actual amount</p> <p>22 is.</p> <p>23 Q. The budget of the task force for 2008, roughly</p> <p>24 how much did the task force spend in 2008?</p> <p>25 A. You would have to ask John Bornschein.</p>
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<p>1 A. As the task force grew, as we had more people</p> <p>2 to help, it lightened my load.</p> <p>3 Q. And when you say as it grew, do you mean in</p> <p>4 terms of the number of people that were employed by the</p> <p>5 task force?</p> <p>6 A. Yes, and the tasks that they took over.</p> <p>7 Q. Do you know why Mrs. Bright asked you in 1988</p> <p>8 whether you would be a cochair for the task force?</p> <p>9 A. No, I don't, other than she trusted -- I guess</p> <p>10 she trusted me. She saw me as somebody that could --</p> <p>11 was capable to take over the chairmanship, but I'm</p> <p>12 speculating. I don't really know her heart on that.</p> <p>13 Q. How did it come about that the offices of the</p> <p>14 task force were relocated from California to the Focus</p> <p>15 on the Family offices?</p> <p>16 A. Well, Focus on the Family moved to Colorado</p> <p>17 Springs in 1991. So, of course, I moved with it. And</p> <p>18 since I had accepted the chairmanship, the ministry</p> <p>19 moved here.</p> <p>20 Q. And the Focus on the Family moved to Colorado</p> <p>21 Springs from where?</p> <p>22 A. From Pomona, California.</p> <p>23 Q. Was there ever any consideration of having the</p> <p>24 offices of the task force in a separate location from</p> <p>25 Focus on the Family when you took over?</p>	<p>1 Q. The overall budget of the task force is not</p> <p>2 anything that you even have a rough approximation of?</p> <p>3 A. I could be wrong and I could be right. I</p> <p>4 would say it's about 1.2 million.</p> <p>5 Q. Currently?</p> <p>6 A. I don't know. I don't know for sure.</p> <p>7 Q. Certainly we're not talking about 2002? When</p> <p>8 you say 1.2 million --</p> <p>9 A. We're talking 2009.</p> <p>10 Q. Okay. Michael Calhoun is responsible for</p> <p>11 strategic partnerships; is that correct?</p> <p>12 A. Uh-huh.</p> <p>13 Q. And what does that mean? What does he do?</p> <p>14 A. The seven centers of power, if you look at it</p> <p>15 as the church, it's the media, it's the military, so he</p> <p>16 usually networks with people in that venture, in the</p> <p>17 seven centers of power. For instance, at some of our</p> <p>18 events, we might want to have a representative from</p> <p>19 Hollywood in the media, so he would be the one that</p> <p>20 would contact that person, see if they were available,</p> <p>21 or a military person.</p> <p>22 Q. Are there any strategic partnerships that are</p> <p>23 more enduring, in other words, rather than, you know,</p> <p>24 for some particular event? She has to have a yes or a</p> <p>25 no.</p>



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1 A. I don't recall.  
 2 Q. So in terms of whether or not there are any  
 3 long-term strategic partnerships that the task force  
 4 has, you do not know?  
 5 A. I don't know.  
 6 Q. Are there any strategic partnerships that  
 7 you're aware of that no longer exist?  
 8 A. Yes.  
 9 Q. Can you give me an example?  
 10 A. Well, we had a donor that owned a car in the  
 11 NASCAR races, and he would paint his car with the  
 12 National Day of Prayer logo.  
 13 Q. He did what?  
 14 A. He would paint his car with the National Day  
 15 of Prayer logo to just help promote the National Day of  
 16 Prayer, and so he no longer is doing that. It became  
 17 too expensive for him. He needed people like Lowe's  
 18 and Home Depot to sponsor his car.  
 19 Q. How was the logo selected?  
 20 A. I think one of the artists in the National Day  
 21 of Prayer helped us put it together. We had many  
 22 different renderings, and we all chose that one. The  
 23 task force chose that one.  
 24 Q. Many of the renderings, though, include the  
 25 NDP with an American flag next to it; is that

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1 correct?  
 2 A. Usually.  
 3 Q. Pardon?  
 4 A. Usually.  
 5 Q. And why was the American flag chosen as a  
 6 prominent part of the task force logo?  
 7 A. Well, this is our National Day of Prayer set  
 8 aside by our Congress, and so it's a day when we pray  
 9 for our country and for our leaders, and that  
 10 symbolizes our country.  
 11 Q. Is there anything in the logo or any of the  
 12 logos that the task force uses that depicts its  
 13 Christian-Judeo orientation?  
 14 A. In the logo?  
 15 Q. Yes.  
 16 A. No.  
 17 MR. THERIOT: Rich, we've been going for about  
 18 an hour.  
 19 MR. BOLTON: We can take a break.  
 20 (A recess was taken.)  
 21 MR. ROSENBERG: Before the deposition, the  
 22 parties agreed that any objection made by one party  
 23 shall be made as to all parties in the deposition so  
 24 that other parties do not have to separately join in  
 25 that objection.

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1 MR. BOLTON: And I think we're all in  
 2 agreement on that.  
 3 MR. THERIOT: Right.  
 4 Q. (BY MR. BOLTON) Gayle Sharman is listed as  
 5 responsible for customer relations for the task force;  
 6 is that correct?  
 7 A. (Witness indicating in the affirmative.)  
 8 Q. What does that involve?  
 9 A. I think she has a new title now. Is that up  
 10 to date?  
 11 Q. I don't know. I'm not sure just what the date  
 12 is. This was something that was produced during  
 13 discovery. Is Gayle still working for the task  
 14 force?  
 15 A. Yes.  
 16 Q. And her job hasn't changed; it's just the  
 17 title may have changed?  
 18 A. You would have to ask John Bornschein. John  
 19 Bornschein is over all the administrative part of the  
 20 ministry, and everybody reports to him, not to me. So  
 21 titles may change, jobs may change within the  
 22 department.  
 23 Q. The description, customer relations, is that a  
 24 title that previously existed, as far as you know?  
 25 A. Probably so.

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1 Q. Pardon?  
 2 A. Probably so.  
 3 Q. In terms of the task force customers, is that  
 4 what basically the constituency that you referred to,  
 5 or is it something different?  
 6 A. I believe she's over ordering. Somebody  
 7 orders -- wants a catalog or a bookmark or a bumper  
 8 sticker or whatever, I believe she's over that;  
 9 resources.  
 10 Q. Lisa Crump, is she still with the task  
 11 force?  
 12 A. Yes.  
 13 Q. And at least the chain of responsibilities  
 14 that I have lists her as involved with the national  
 15 network. Is that still what she does?  
 16 A. She's over all the coordinators, the state  
 17 coordinators, the regional. We have national area  
 18 leaders. They're over like six or seven states.  
 19 Q. Carol Mock is the military liaison; is that  
 20 correct?  
 21 A. That's correct.  
 22 Q. And Faye Tharp is involved with public  
 23 affairs?  
 24 A. That's right.  
 25 Q. What does her work involve?

13 (Pages 46 to 49)

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<p>1 A. Constituent building, making friends. She's</p> <p>2 in charge of donors.</p> <p>3 Q. Does she travel much for that?</p> <p>4 A. Some.</p> <p>5 Q. We were talking a little bit earlier about the</p> <p>6 task force encouraging governors to issue</p> <p>7 proclamations. That was something that really wasn't</p> <p>8 widely done before you became the chairman of the task</p> <p>9 force; is that correct?</p> <p>10 A. I don't know.</p> <p>11 Q. Do you know whether the number of</p>	<p>1 Q. And people, when they told you something,</p> <p>2 you -- I mean, they had a history of reporting</p> <p>3 correctly to you, correct?</p> <p>4 A. Usually the task force, as the proclamations</p> <p>5 are coming in, they let me know that they're excited</p> <p>6 that we have 5, 10, 30. You know, I get reports.</p> <p>7 Q. And then these proclamations at some point you</p> <p>8 start posting on the task force Website, correct?</p> <p>9 A. Correct.</p> <p>10 Q. Do you know when that began?</p> <p>11 A. I don't.</p>
<p>12 proclamations that are issued by governors has</p> <p>13 increased under your chairmanship?</p> <p>14 A. Yes, it has increased.</p> <p>15 Q. And I understand that you described the letter</p> <p>16 would be written and signed by you and sent to each of</p> <p>17 the governors, correct?</p> <p>18 A. That's correct.</p> <p>19 Q. When did you start sending letters to each of</p> <p>20 the governors?</p> <p>21 A. I've been chairman for 19 years, and I can't</p> <p>22 tell you the exact time when we did that. I know that</p> <p>23 Mrs. Bright also requested governors sign a</p> <p>24 proclamation for the National Day of Prayer.</p> <p>25 Q. And if you don't get a proclamation from a</p>	<p>12 Q. And I understand that all the state</p> <p>13 proclamations are bound and made in a real presentable</p> <p>14 package and given to the President; is that correct?</p> <p>15 A. It was given to President Bush.</p> <p>16 Q. Was that something that was unique during</p> <p>17 President Bush's presidency?</p> <p>18 A. It was unique that we were given 50</p> <p>19 proclamations, and we thought we would make a nice gift</p> <p>20 for the President on the National Day of Prayer.</p> <p>21 Q. And so prior to actually having all 50</p> <p>22 governors accounted for, you hadn't done that?</p> <p>23 A. Right. Correct.</p> <p>24 Q. Some of the letters to the governors, before</p> <p>25 you got the proclamations, encouraged them indicating</p>
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<p>1 governor, is there any pressure put on the governor to</p> <p>2 issue a National Day of Prayer proclamation?</p> <p>3 A. Not from the task force. It's only a</p> <p>4 request.</p> <p>5 Q. Pardon me?</p> <p>6 A. Our letter is only a request.</p> <p>7 Q. Now, a couple of years back, Eliot Spitzer,</p> <p>8 the governor of New York, was fairly late in issuing</p> <p>9 his proclamation. Do you recall that?</p> <p>10 A. Yes.</p> <p>11 Q. And my understanding is that someone on behalf</p> <p>12 of the task force had contacted his office several</p> <p>13 times to see whether or not a proclamation would be</p> <p>14 forthcoming. Would that type of contact be unusual?</p> <p>15 A. I would say yes.</p> <p>16 Q. I mean, the task force was certainly aware</p> <p>17 that Governor Spitzer was the last governor who had not</p> <p>18 yet issued a proclamation; is that correct?</p> <p>19 A. Correct.</p> <p>20 Q. You knew that he was still unaccounted for in</p> <p>21 terms of his proclamation, correct?</p> <p>22 A. I was told that.</p> <p>23 Q. Okay. And you were told that by people that</p> <p>24 you work with, correct?</p> <p>25 A. Yes.</p>	<p>1 that that was what you intended to do; is that</p> <p>2 correct?</p> <p>3 A. I don't recall what was in the letters.</p> <p>4 Q. Now, with regard to Governor Spitzer, my</p> <p>5 understanding is that from some quarters, a fair amount</p> <p>6 of pressure was put forth for him to sign the</p> <p>7 proclamation, correct?</p> <p>8 MR. ROSENBERG: Objection, form.</p> <p>9 A. I have no understanding of that.</p> <p>10 Q. (BY MR. BOLTON) Pardon?</p> <p>11 A. I have no understanding of any pressure that</p> <p>12 was put on him.</p> <p>13 Q. You don't?</p> <p>14 A. No.</p> <p>15 Q. Okay. If I told you that Mr. Dobson had</p> <p>16 criticized the governor on his radio program for not</p> <p>17 having issued a proclamation, would that surprise</p> <p>18 you?</p> <p>19 A. No.</p> <p>20 Q. And that he had sent out a mass e-mail to</p> <p>21 people encouraging them to essentially raise a fuss</p> <p>22 about the governor not having issued a proclamation,</p> <p>23 would that surprise you?</p> <p>24 A. I have no knowledge of that.</p> <p>25 Q. Never even heard that that might have</p>

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1 happened?  
 2 A. Not an e-mail.  
 3 Q. Pardon?  
 4 A. I wasn't aware of an e-mail that was sent  
 5 out.  
 6 Q. But the radio coverage by Mr. Dobson you're  
 7 aware of, correct?  
 8 A. I am.  
 9 Q. And how did it come about that Mr. Dobson was  
 10 even aware that Governor Spitzer had not yet submitted  
 11 his proclamation?  
 12 MR. THERIOT: Objection, calls for  
 13 speculation. You may answer.  
 14 A. I can't speculate.  
 15 Q. (BY MR. BOLTON) Well, you know Mr. Dobson,  
 16 obviously.  
 17 A. Pretty well.  
 18 Q. Did you tell Mr. Dobson that New York was  
 19 unaccounted for?  
 20 A. I don't recall.  
 21 Q. Were you surprised that Mr. Dobson had made  
 22 this a subject of his radio program?  
 23 A. No.  
 24 Q. Are you aware of any other governors who  
 25 were subject to at least public criticism for not

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1 having issued a proclamation, other than Governor  
 2 Spitzer?  
 3 A. Well, of course, every state coordinator hopes  
 4 that the governor will proclaim prayer in the state on  
 5 the National Day of Prayer. So I'm sure the state  
 6 coordinators made contact with Governor Spitzer and any  
 7 other governor, because they're hoping that the  
 8 governor will support our nation's day of prayer.  
 9 Q. But in terms of any other specific instances,  
 10 you're not aware of?  
 11 A. The wrestler -- who was the governor that was  
 12 the wrestler?  
 13 Q. Governor Ventura.  
 14 A. He did not issue a proclamation.  
 15 Q. And was any effort made to get him to get on  
 16 board and issue a proclamation?  
 17 A. Not from the task force and not from the state  
 18 coordinators, as far as I know. We instruct them not  
 19 to put any pressure on anybody, governor or mayor,  
 20 anybody to sign a proclamation. It's just a request.  
 21 Q. When you write to the governors, do you  
 22 include a suggested proclamation for them?  
 23 A. No, we don't write one for them.  
 24 Q. Have you ever ghostwritten any proclamation  
 25 that an official could decide to use or decide not to

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1 use?  
 2 A. Not for the governors.  
 3 Q. Any other public officials?  
 4 A. You mean draft a proclamation for them?  
 5 Q. Uh-huh.  
 6 A. We have -- yes, we have done that for the  
 7 White House, because we know how busy the President is,  
 8 and so we draft it, but not one president has ever used  
 9 it. I think once or twice we've seen a sentence that's  
 10 been used, but they have their own writers and they  
 11 write their own proclamations.  
 12 Q. When did the task force begin choosing a theme  
 13 for each year's National Day of Prayer?  
 14 A. Since I became chairman.  
 15 Q. So that was something that you began right off  
 16 the bat?  
 17 A. Yes.  
 18 Q. And when you began choosing an annual theme,  
 19 was there also from that very beginning a selection of  
 20 a biblical reference that was also used in association  
 21 with the theme?  
 22 A. We call it a supporting scripture, yes.  
 23 Q. And how is the annual theme selected?  
 24 A. I go before the Lord every year in prayer, and  
 25 I ask him, what is on his heart for our nation. And

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1 then I look at the culture, what's going on in the  
 2 culture. And through prayer, He usually gives me the  
 3 perfect theme for that year.  
 4 Q. And then the same process for choosing the  
 5 supporting scripture?  
 6 A. Yes.  
 7 Q. And is there a particular -- I mean, all the  
 8 supporting scripture comes from the Bible; is that  
 9 correct?  
 10 A. Correct.  
 11 Q. You've never used supporting scripture from  
 12 any other source, correct?  
 13 A. Correct.  
 14 Q. And would you consider using any other  
 15 source?  
 16 A. No. Because, as I said, we are the  
 17 Judeo-Christian expression, so we would use the  
 18 Christian Bible. We would find a scripture from the  
 19 God of the Bible. Sometimes it's from the Old  
 20 Testament, sometimes it's from the New Testament.  
 21 Q. And would your constituency, the task force  
 22 constituency, recognize that source for the supporting  
 23 scripture?  
 24 A. Yes, I believe they would.  
 25 Q. Now, my understanding is that when you send

15 (Pages 54 to 57)

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1 letters to the governors, you also encourage them to  
2 include your annual theme and supporting scripture  
3 within their own proclamations; is that correct?

4 A. Not true, no.

5 Q. And my understanding, though, is that at least  
6 in the last few years, many, if not most, of the  
7 governors are including the annual theme?

8 MR. THERIOT: Objection, vague.

9 A. I don't know.

10 Q. (BY MR. BOLTON) You don't know that?

11 A. I don't know.

12 Q. No? Is there any reference made to the  
13 supporting scripture and the annual theme in the letter  
14 that you send to the governors?

15 A. Yes, all the letters that go out have our  
16 theme and the supporting scripture, but we don't ask  
17 them to use it. We don't ask the governors to use it.  
18 We just list it in the letter. If they choose to use  
19 it, it's up to them.

20 Q. Are you hopeful that they'll use it?

21 A. It would be nice.

22 Q. Why?

23 A. Well, because I feel like that that particular  
24 theme, you know, was given to me by the Lord. For  
25 instance, the 2009 theme is for Prayer for Such a Time

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1 As This. I would say that 40,000 volunteers and  
2 coordinators are going to be using that theme, and it  
3 would be nice if the governor chose to, but there's no  
4 pressure. It's just listed in the letter. It's just  
5 listed in the letter that we send to them.

6 Q. And the theme and the supporting scripture has  
7 been incorporated in some presidential proclamations as  
8 well; is that correct?

9 A. I don't know. I don't recall. I don't think  
10 it has.

11 Q. Pardon me?

12 A. I don't think a President has ever put the  
13 theme in the proclamation.

14 Q. But a number of governors have, correct?

15 A. I don't recall.

16 Q. Has anyone at the task force ever reported to  
17 you that at least some governors have incorporated the  
18 theme and the supporting scripture?

19 A. No.

20 Q. Is my mentioning it right now the first time  
21 you've ever heard that?

22 A. The first Thursday of May is a very --

23 Q. Pardon me?

24 A. The first Thursday of May is a very busy time  
25 in our office, and so as the proclamations come in, I'm

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1 not always aware of what the governors -- I don't read  
2 every one of them. They're kept in the office and  
3 compiled there.

4 Q. Is there any reason why, in your letter to the  
5 governors, that you would include a reference to the  
6 Judeo-Christian expression of the annual theme and  
7 supporting scripture that you've selected?

8 A. The theme and the supporting scripture is part  
9 of our -- part of the letters that we send out. Almost  
10 all of the letters on the National Day of Prayer, we  
11 alert people to what the Judeo-Christian theme is going  
12 to be, and some use it. Some churches use it, some  
13 don't. Some prayer gatherings use it, some don't. I  
14 imagine some governors use it in their proclamations,  
15 but I'm not aware of it.

16 Q. Do you think it's appropriate for a governor  
17 to include a Judeo-Christian expression in their annual  
18 proclamation?

19 A. I wouldn't speculate on that.

20 Q. Certainly from your perspective, though,  
21 you're not opposed to it? You're not opposed to it,  
22 correct?

23 A. No.

24 Q. And that's why you include it in the letters  
25 to the governors, isn't it?

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1 A. It's just a statement of what the theme is and  
2 what the supporting scripture is. We don't know what  
3 the governor is going to do with it.

4 Q. Why did you start choosing an annual theme?

5 A. I think a theme is good. It brings unity to  
6 the nation.

7 Q. Certainly there's nothing, though, in the  
8 legislative requirement that the President dedicate a  
9 day of prayer that requires any sort of annual theme,  
10 correct?

11 A. No.

12 Q. There's nothing that requires any sort of  
13 reference to supporting scripture, correct?

14 A. Correct.

15 Q. And so to the extent that these things are  
16 incorporated into presidential proclamations or  
17 governor proclamations, that is not something that is  
18 legally required, correct?

19 MR. ROSENBERG: Objection, calls for a legal  
20 conclusion.

21 Q. (BY MR. BOLTON) You're not aware that it's  
22 required, correct?

23 A. No.

24 MR. ROSENBERG: Same objection.

25 Q. (BY MR. BOLTON) Are you aware of any

16 (Pages 58 to 61)



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1 expression of any other specific religious orientation  
 2 that's ever been incorporated into a governor's  
 3 proclamation?  
 4 A. I'm not aware of it.  
 5 Q. Or presidential proclamation?  
 6 A. I'm not aware of it.  
 7 MR. THERIOT: I'm going to object to that  
 8 question, because it assumes facts not established.  
 9 Q. (BY MR. BOLTON) The task force objective of  
 10 encouraging prayer, that general goal could certainly  
 11 be accomplished without any specific reference to the  
 12 National Day of Prayer, correct?  
 13 A. The task force is to publicize and promote and  
 14 continue the tradition of a National Day of Prayer.  
 15 Q. But the goal of encouraging prayer, that goal,  
 16 if you wanted to, could be done without being tied to  
 17 the National Day of Prayer, correct?  
 18 A. It could, but the National Day of Prayer is a  
 19 rallying point. It's a day when we're focusing on  
 20 prayer for our country.  
 21 Q. And you know that because it's declared as  
 22 such by the President each year?  
 23 A. Correct.  
 24 Q. Thinking back, do you know when you first  
 25 became aware of the National Day of Prayer?

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1 A. I would say 1987.  
 2 Q. Pardon?  
 3 A. 1987.  
 4 Q. And how did you become aware of it?  
 5 A. Mainly through Mrs. Vonette Bright, our  
 6 friendship with the Brights.  
 7 Q. And that initial understanding or that initial  
 8 awareness of the National Day of Prayer, what did you  
 9 understand the National Day of Prayer to be?  
 10 A. A day set aside for prayer in our nation, just  
 11 like Veterans' Day or 4th of July. It was a special  
 12 day, and on this occasion, for prayer.  
 13 Q. And certainly you understand that prayer has  
 14 an integral relationship to religion; is that  
 15 correct?  
 16 MR. THERIOT: Objection, calls for  
 17 speculation.  
 18 A. I can't speculate on that.  
 19 Q. (BY MR. BOLTON) So whether or not prayer has a  
 20 connection to religion, that would require you to  
 21 engage in speculation?  
 22 A. Well, I can only speak for the Christian  
 23 prayer.  
 24 Q. Pardon me?  
 25 A. I can only speak for the Christian prayer.

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1 Q. Do you know of prayer being used in a  
 2 nonreligious context?  
 3 A. I can't speculate on that.  
 4 Q. Certainly as you understood the National Day  
 5 of Prayer as a day set aside for prayer, though, you  
 6 understood it to have a relationship to religion; is  
 7 that correct?  
 8 A. Well, in the Christian faith, we don't talk  
 9 about religion. We talk about a relationship, a  
 10 relationship with God, and so I'm not sure what you're  
 11 asking.  
 12 Q. Okay. So you wouldn't associate prayer, even  
 13 in the Christian-Judeo orientation, as a religious  
 14 concept but as something that is related to  
 15 establishing and having a relationship with the God of  
 16 the Bible, correct?  
 17 A. I would say that is correct.  
 18 Q. Do you associate the Bible as having a  
 19 religious relationship?  
 20 A. The Bible is the Christian Bible. So if you  
 21 want to call Christianity a religion, then the Bible  
 22 would, of course, be our handbook.  
 23 Q. Whether or not we connect the relationship to  
 24 the God of the Bible as being a religious concept,  
 25 certainly you associate prayer with that relationship,

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1 with that relationship with the God as you know it?  
 2 A. Yes.  
 3 Q. You talk about prayer in terms of the National  
 4 Day of Prayer. When the National Day of Prayer Task  
 5 Force makes reference to prayer, that is the definition  
 6 that you're using, the relationship with the God of the  
 7 Bible?  
 8 A. Correct.  
 9 Q. What is the National Day of Prayer four-step  
 10 approach?  
 11 A. Pardon me?  
 12 Q. Have you ever heard of the National Day of  
 13 Prayer four-step approach to effective communication  
 14 with God?  
 15 A. Are you talking about the PRAY acronym?  
 16 Q. Am I correct that you've described it as the  
 17 National Day of Prayer four-step approach to effective  
 18 communication with God?  
 19 A. Are you talking about the PRAY acronym?  
 20 Q. Yes.  
 21 A. Yes. That's just a way to pray. That's just  
 22 one way to pray.  
 23 Q. And in your book, Certain Peace in Uncertain  
 24 Times, Embracing Prayer in an Anxious Time, you make  
 25 reference to that four-step approach and identify it as

17 (Pages 62 to 65)

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1 something associated with the National Day of Prayer,  
2 correct?

3 A. Correct.

4 Q. How is that association made? How do you  
5 promote that four-step approach to prayer?

6 A. It's just one way to pray. It's just a way to  
7 remember the steps to, you know -- for instance, we  
8 took it from pray, and the P would be praise, to start  
9 out your prayer with praise. This is not necessarily  
10 on the National Day of Prayer. This is any time. This  
11 is an acronym for prayer any time. And then the R is

12 for repent. The scriptures tell us that we are to  
13 repent before an Almighty God when we have sinned  
14 against him. And then the A is ask, praying for our --  
15 praying for whatever needs we have in our life, and  
16 then the Y is to yield, and say, Not my will but Thine  
17 be done.

18 Q. When did you begin associating that four-step  
19 approach with the National Day of Prayer?

20 A. I don't recall the exact year we did that.

21 Q. My understanding is that you consider prayer  
22 to be important not just to individuals but also to  
23 entire nations; is that correct?

24 A. Absolutely correct.

25 Q. And what do you mean by that?

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1 A. Well, I believe that we serve an Almighty God,  
2 and that I believe in his creation, I believe that He  
3 blesses or brings judgment on the nation as to how they  
4 see Him, how they honor Him.

5 Q. And that prayer at the national level that  
6 you're talking about, again, from your perspective,  
7 from the task force's perspective rather, you're  
8 talking about a particular type of prayer, prayer to  
9 the God of the Bible, correct?

10 A. The Judeo-Christian expression of the National  
11 Day of Prayer is to pray to the God of the Bible, but  
12 other faiths can pray to whomever their God is. There  
13 may be other task forces out there. We're not aware of  
14 them.

15 Q. But in terms of providing that protective  
16 shield for the nation, it is the task force's view that  
17 praying to other gods is not going to provide that same  
18 protective shield as the expression in the  
19 Christian-Judeo prayer; is that correct?

20 A. I let God judge people's prayers. I don't  
21 judge them. I don't know how He hears their prayers.

22 Q. Do you think that all prayers, in terms of  
23 protecting the nation, are equal?

24 A. I can't speculate on that. I don't know how  
25 God sees that.

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1 Q. But you believe that the prayer to the God  
2 that you pray to is -- I mean, at least as the task  
3 force views it, that that is a particular God and that  
4 that is the right God to pray to, correct?

5 A. We pray to our Almighty God.

6 Q. And so other people may pray to different  
7 gods, correct?

8 A. Correct.

9 Q. But at least in the view of the task force,  
10 and its belief in the Christian-Judeo expression, that  
11 those prayers would not be as effective for the nation  
12 as the expression of prayer that you promote,  
13 correct?

14 A. I can't say that.

15 Q. But you don't consider all prayer to be equal,  
16 right?

17 A. I believe -- my personal belief is that I  
18 believe there is one God, and that's the God that we  
19 pray to.

20 Q. And while others may pray to a different God  
21 then, you at least believe that prayer to the God that  
22 you believe in is the one that is most effective,  
23 correct?

24 MR. THERIOT: I'm going to object. I think it  
25 calls for speculation. She can certainly testify

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1 on her personal beliefs about what she believes in her  
2 prayers. But what other people's prayers are, I don't  
3 know how she can testify to that.

4 Q. (BY MR. BOLTON) Well, tell me what you believe  
5 then.

6 A. I believe what the Bible says. God says that  
7 He is the one and only God, and his son, Jesus Christ,  
8 is the way -- is our salvation to God. So that's my  
9 personal belief, and I would say that's the belief of  
10 the Christian church.

11 Q. What would be your reaction to a governor  
12 including an annual theme and reference from some holy  
13 book or source, other than the Bible, in their  
14 proclamation?

15 A. The governor can sign the proclamation however  
16 he wants to. We have no authority over that, and if he  
17 wants to use his own theme -- for instance, if we have  
18 a Muslim governor and he wants to use a Muslim theme  
19 and proclaim that Muslim day of prayer in his state,  
20 there's nothing we can do about that. That's totally  
21 up to the governor.

22 Q. But at least in terms of providing that  
23 protective shield, you would be skeptical that that  
24 would be as effective as including a scriptural  
25 reference from the Bible?

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<p>1 A. My personal belief is that the God of the</p> <p>2 Bible is the one who protects, blesses and protects a</p> <p>3 nation.</p> <p>4 Q. How does praying provide a protective</p> <p>5 shield?</p> <p>6 A. Well, I believe that the God of the Bible has</p> <p>7 the ultimate -- is ultimately in control of the whole</p> <p>8 universe, of the earth, of the continents, of the</p> <p>9 community, of the states. I believe He is involved in</p> <p>10 everything, and He is Almighty and He can bless or He</p> <p>11 can curse.</p>	<p>1 that, correct?</p> <p>2 A. Yes, correct.</p> <p>3 Q. And did you ever discuss the National Day of</p> <p>4 Prayer and what it meant with President Bush?</p> <p>5 A. No.</p> <p>6 MR. ROSENBERG: Objection. Which President</p> <p>7 Bush?</p> <p>8 A. Neither.</p> <p>9 Q. (BY MR. BOLTON) Pardon?</p> <p>10 A. Neither one of them. I never discussed it</p> <p>11 with them.</p>
<p>12 Q. And having that protective shield at the</p> <p>13 national level is a good thing, correct?</p> <p>14 A. Of course.</p> <p>15 Q. What is corporate prayer?</p> <p>16 A. Corporate prayer is, you know, people</p> <p>17 gathering together, more than two, but prayer</p> <p>18 gatherings, it could be 5, 10, it could be 40,000.</p> <p>19 It's people gathering together to pray.</p> <p>20 Q. And in the task force activities organized</p> <p>21 around the National Day of Prayer, certainly corporate</p> <p>22 prayer is something that the volunteers and state</p> <p>23 coordinators are encouraged to promote, correct?</p> <p>24 A. We believe that our constitutional rights are</p> <p>25 to gather, to worship and to pray.</p>	<p>12 Q. But in terms of the White House functions,</p> <p>13 they were with George W. Bush, correct?</p> <p>14 A. Correct. There was one with his father, and</p> <p>15 he gave a reception on the National Day of Prayer.</p> <p>16 Q. And how many National Day of Prayer functions</p> <p>17 have you attended in the White House?</p> <p>18 A. Would the Rose Garden be considered the White</p> <p>19 House?</p> <p>20 Q. Let's consider it part of the White House.</p> <p>21 A. Okay. Ten.</p> <p>22 Q. And a number of these were held in the East</p> <p>23 Room?</p> <p>24 A. Yes.</p> <p>25 Q. These particular locations with regard to the</p>
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<p>1 Q. And so certainly corporate prayer, or the</p> <p>2 gathering for prayer, is an important part of the task</p> <p>3 force's objective, correct?</p> <p>4 A. No. I would say the objective is for -- to</p> <p>5 mobilize the Christian community to pray either in</p> <p>6 their homes, around their dinner tables, in their</p> <p>7 churches, or in the public square, however they want to</p> <p>8 celebrate this nation's day of prayer.</p> <p>9 Q. Certainly, though, the volunteers and the</p> <p>10 state coordinators are -- I mean, what their intent to</p> <p>11 do is organize activities around the National Day of</p> <p>12 Prayer that will involve corporate prayer, correct?</p> <p>13 A. Correct. They like to organize a prayer</p> <p>14 gathering.</p> <p>15 Q. Now, did you know President Reagan?</p> <p>16 A. Not personally. I've met him, but I can't say</p> <p>17 I know him.</p> <p>18 Q. Did you ever discuss the National Day of</p> <p>19 Prayer with President Reagan?</p> <p>20 A. Never.</p> <p>21 Q. Have you discussed the National Day of Prayer</p> <p>22 with any president?</p> <p>23 A. Never.</p> <p>24 Q. When you would participate in National Day of</p> <p>25 Prayer activities in the White House -- and you did do</p>	<p>1 White House and functions of the National Day of</p> <p>2 Prayer, were they activities that were organized by the</p> <p>3 task force?</p> <p>4 A. No.</p> <p>5 Q. And can you describe these functions that you</p> <p>6 attended at the White House?</p> <p>7 A. Well, the President would decide whether he</p> <p>8 was going to have a prayer observance or not. So if he</p> <p>9 had a prayer observance, we were invited to come, but</p> <p>10 also he had his own personal list of who he invited.</p> <p>11 And other religions were there, not just our task</p> <p>12 force.</p> <p>13 Q. Do you know how it came about that these</p> <p>14 occasions, these functions, began to be hosted by the</p> <p>15 President?</p> <p>16 MR. THERIOT: Objection, calls for</p> <p>17 speculation. You may answer.</p> <p>18 A. Well, I don't recall, because President Ronald</p> <p>19 Reagan just had a breakfast, and we were invited.</p> <p>20 Q. (BY MR. BOLTON) So you attended a national</p> <p>21 prayer breakfast?</p> <p>22 A. National Day of Prayer breakfast.</p> <p>23 Q. Was it held on the National Day of Prayer?</p> <p>24 A. Yes.</p> <p>25 Q. And when was that?</p>

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1 A. Well, whenever Ronald Reagan was in office. I  
 2 can't recall the exact year, but during his tenure.  
 3 Q. And when you attended the White House national  
 4 prayer day functions, you attended, obviously?  
 5 A. Yes, I was invited.  
 6 Q. Mr. Dobson attended?  
 7 A. Yes.  
 8 Q. Did you speak?  
 9 A. Yes.  
 10 Q. How many times have you spoken at a White  
 11 House function in regard to the National Day of  
 12 Prayer?  
 13 A. Eight.  
 14 Q. And did your husband speak at any of these?  
 15 A. No.  
 16 Q. Did you speak as a representative of the task  
 17 force?  
 18 A. No.  
 19 Q. Did you speak as an individual?  
 20 A. Yes, as the chairman of the National Day of  
 21 Prayer.  
 22 Q. Okay. So you were asked to attend as the  
 23 chairman of the National Day of Prayer?  
 24 A. No. I was just asked to attend.  
 25 Q. Pardon me?

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1 A. I was just asked to attend.  
 2 Q. Okay. You must have been asked to speak too.  
 3 A. I was.  
 4 Q. And you spoke about the importance of prayer,  
 5 correct?  
 6 A. In our country, correct.  
 7 Q. Now, my understanding is that there are other  
 8 Washington, D.C. -- or that there are Washington, D.C.  
 9 national prayer day activities that the task force is  
 10 involved in organizing; is that correct?  
 11 A. That's correct.  
 12 Q. Can you describe those activities?  
 13 A. Well, on Wednesday night before the National  
 14 Day of Prayer, we have a reception.  
 15 Q. Where is the reception held?  
 16 A. Usually at a hotel. Sometimes it's at the  
 17 J.W. Marriott or whatever. And that's mainly for our  
 18 donors that contribute to the National Day of Prayer  
 19 and friends that live in Washington, D.C. Some  
 20 religious leaders come and some congressmen attend.  
 21 And they usually -- we send out invitations, and then  
 22 they let us know whether they're coming or not.  
 23 Q. And that's the night before?  
 24 A. Uh-huh.  
 25 Q. And then there must be some activities that

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1 you're involved in organizing in the capitol on the  
 2 actual designated day, correct?  
 3 A. Correct.  
 4 Q. Not just functions that you attend, but  
 5 functions that are organized by the task force,  
 6 correct?  
 7 A. Correct.  
 8 Q. Describe those activities.  
 9 A. We have a prayer gathering at the Cannon House  
 10 office building on the National Day of Prayer.  
 11 Q. And how long has the task force been hosting  
 12 that or organizing that activity?  
 13 A. That was hosted under Mrs. Vonette Bright, so  
 14 I don't know. Whenever she -- they started.  
 15 Q. So it preceded your chairmanship?  
 16 A. Correct.  
 17 Q. And it continued under your chairmanship,  
 18 correct?  
 19 A. Correct.  
 20 Q. And it's continued without interruption under  
 21 your chairmanship, correct?  
 22 A. Correct.  
 23 Q. And it's one of the most important activities  
 24 organized by the task force, correct?  
 25 A. I would say it's not any more important than

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1 any other prayer gathering across the nation. We're  
 2 there because that's the seat of our government, and  
 3 we're there to pray for our leaders, for the President,  
 4 for his cabinet, for all those that lead our country.  
 5 Q. Is it important that it's held in the Cannon  
 6 office building?  
 7 A. I think because it's a nice room.  
 8 Q. It's what?  
 9 A. It's a nice room. And, again, it's in  
 10 Washington, D.C., and we feel that's the seat of our  
 11 government, and it's easy access for the congressmen  
 12 and the senators because it's right there if they  
 13 choose to drop in.  
 14 Q. And the Cannon office building is a government  
 15 building, correct?  
 16 A. Correct.  
 17 Q. And my understanding is that you invite  
 18 representatives of the executive branch to attend,  
 19 correct?  
 20 A. Correct.  
 21 Q. And you've had individuals from the executive  
 22 branch attend, correct?  
 23 A. We invite the three branches of government.  
 24 We invite a representative from the executive branch,  
 25 from the legislative branch, from the judicial branch,

20 (Pages 74 to 77)



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<p>1 and a representative from the military, and we see them</p> <p>2 as standing in the gap for their particular office</p> <p>3 across the land.</p> <p>4 Q. And so the actual activities held in the</p> <p>5 Cannon office building, presumably it involves just</p> <p>6 more than getting these people together, correct?</p> <p>7 You've got a program?</p> <p>8 A. We have a prayer service.</p> <p>9 Q. And are the representatives from the different</p> <p>10 branches of government asked to speak at this prayer</p> <p>11 service?</p>	<p>1 fine.</p> <p>2 Q. So you don't ask them to, you just suggest it,</p> <p>3 is that the distinction you're making?</p> <p>4 A. We suggest it.</p> <p>5 Q. The activities at the Cannon office building</p> <p>6 then, are they televised?</p> <p>7 A. I think the last year was the first time they</p> <p>8 were televised. I would say not televised. I would</p> <p>9 say Webcast.</p> <p>10 Q. And who televised it?</p> <p>11 A. God TV.</p>
<p>12 A. Yes.</p> <p>13 Q. And have they in the past?</p> <p>14 A. Yes.</p> <p>15 Q. Representatives of the executive branch have,</p> <p>16 correct?</p> <p>17 A. Yes.</p> <p>18 Q. And the legislative branch as well, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Have you had any speaker from the judicial</p> <p>21 branch?</p> <p>22 A. Yes.</p> <p>23 Q. And they're given at least a little suggestion</p> <p>24 of what you would like them to address in their</p> <p>25 remarks, correct?</p>	<p>12 Q. What is it called?</p> <p>13 A. It's called God TV.</p> <p>14 Q. And who's behind that?</p> <p>15 A. Again, you would have to ask John Bornschein,</p> <p>16 who's the administrative director of the National Day</p> <p>17 of Prayer. I don't even know how big the affiliate</p> <p>18 is.</p> <p>19 Q. 2008 was televised, correct? Do you need a</p> <p>20 break?</p> <p>21 A. No. I saw you looking over there. I thought</p> <p>22 someone came in.</p> <p>23 Q. 2008 was televised, correct?</p> <p>24 A. I believe so.</p> <p>25 Q. And then was 2009 also?</p>
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<p>1 A. Correct.</p> <p>2 Q. You asked them to speak to the importance of</p> <p>3 religion in their own life, correct?</p> <p>4 A. No. We ask them to give us the prayer needs</p> <p>5 and requests of their particular branch. For instance,</p> <p>6 the legislative branch would maybe ask a prayer for</p> <p>7 their families for the long hours that they put in,</p> <p>8 that God would give them wisdom on the decisions that</p> <p>9 they make, and so they make some comments on their</p> <p>10 particular branch. And if they want to talk about what</p> <p>11 prayer has meant in their life, they're free to do</p> <p>12 that.</p> <p>13 Then a representative of the National Prayer</p> <p>14 Committee steps up on the platform and prays for that</p> <p>15 particular area. For instance, the judge would be</p> <p>16 standing in the gap for the judicial branch all across</p> <p>17 our land, and we would pray for all of our people that</p> <p>18 are involved in the judiciary, including all of you.</p> <p>19 Q. And it's your testimony today, though, that in</p> <p>20 inviting representatives of the different branches of</p> <p>21 government, that you don't also encourage them to speak</p> <p>22 about the role that religion has played in their</p> <p>23 lives?</p> <p>24 A. We ask them -- we suggest that if they would</p> <p>25 like to speak about prayer, you know, that would be</p>	<p>1 A. Yes.</p> <p>2 Q. And do you know whether any effort was made to</p> <p>3 determine whether or not the broadcast was widely</p> <p>4 viewed?</p> <p>5 A. Again, you would have to ask our executive</p> <p>6 director who handles the production, you know.</p> <p>7 Q. Is it something that the task force pays</p> <p>8 for?</p> <p>9 A. If we're charged, we do. Sometimes they give,</p> <p>10 you know, free service. But if they charge us, we pay</p> <p>11 for it.</p> <p>12 Q. Do you know whether --</p> <p>13 A. I think God TV gave us the time.</p> <p>14 Q. Do you pay anything for use of the Cannon</p> <p>15 office building?</p> <p>16 A. No.</p> <p>17 Q. Now, are you aware of any other National Day</p> <p>18 of Prayer activities that are held in the Cannon office</p> <p>19 building?</p> <p>20 A. No. We just have the one prayer service.</p> <p>21 Q. But, I mean, are you aware of any activities</p> <p>22 organized and conducted in the Cannon office building</p> <p>23 by other organizations?</p> <p>24 A. Well, I know Dr. Corinthia Boone, who handles</p> <p>25 the Washington, D.C. event, she has some kind of a</p>

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1 service for pastors, but I don't know where it's held.  
2 I don't know what room it's held in, but it's in the  
3 Cannon House office building. I think it serves  
4 pastors.

5 Q. How does a person or an organization go about  
6 getting access to use the Cannon office building for an  
7 activity such as you host?

8 A. We make a request to the Speaker of the House,  
9 and they have to approve it.

10 Q. And that's at least since before you became  
11 the chairman, that process has been going on,  
12 correct?

13 A. Correct.

14 Q. Do you agree or disagree that the President  
15 should not promote prayer?

16 MR. ROSENBERG: Objection as to form.

17 A. Can you state the question again?

18 MR. BOLTON: Can you read it back?

19 (The requested question was read back by the  
20 reporter.)

21 Q. (BY MR. BOLTON) Let me rephrase it. Do you  
22 believe that the President should promote prayer?

23 A. I would like for him to, because he is the  
24 leader of the nation. At least on the National Day of  
25 Prayer, I would like him to encourage prayer.

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1 Q. And would that be true also, then, of  
2 Congress?

3 A. Well, Congress already did. They signed in  
4 1988 and 1952 that we should have a National Day of  
5 Prayer.

6 Q. Now, do you know anything about the history of  
7 that 1952 legislative enactment signed by President  
8 Eisenhower?

9 A. It was signed by President Truman.

10 Q. I'm sorry.

11 A. No.

12 Q. Do you know whether it had anything to do with  
13 being a reaction to the Cold War that was going on and  
14 a response to communism?

15 A. I was in high school at that time. I had no  
16 knowledge of that.

17 Q. I understand. But you don't have any  
18 knowledge of the things that happened in the Bible  
19 either, right?

20 A. Some. Well, not the history.

21 Q. Pardon me?

22 A. Not the creation of it, of course.

23 Q. But the fact that you weren't there doesn't  
24 mean -- your knowledge is not limited to the things  
25 that you actually personally witnessed, correct?

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1 A. That's true.

2 Q. But in terms of the history of the 1952  
3 enactment, you not only were not there, but you have  
4 not subsequently learned anything about the history of  
5 that enactment?

6 A. No.

7 Q. And you've described what you know in terms of  
8 the enactment in 1988 designating a specific day for  
9 the day of prayer, correct?

10 A. Yes.

11 Q. Has the task force, under your guidance, been  
12 successful in what it's intended to do?

13 A. Yes.

14 Q. And how do you determine that?

15 A. Well, when I took over the National Day of  
16 Prayer, we had a very small coordinator base, and it  
17 has grown --

18 Q. Very small what?

19 A. Coordinator base, volunteer base. And it has  
20 grown under my leadership. I don't take credit for it.  
21 I see it as the blessing of God. I don't take a  
22 salary. I volunteer my time, so do all of our  
23 coordinators. But the coordinator base has really  
24 grown, and there's been more involvement in the  
25 National Day of Prayer in our nation.

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1 Q. Do you think that the task force has been  
2 successful in mobilizing Christians to engage in  
3 prayer?

4 A. Yes.

5 Q. And how do you measure that?

6 A. Just by the number of people that are involved  
7 in the prayer movement.

8 Q. "In the prayer movement," is that what you  
9 said?

10 A. Uh-huh.

11 Q. And when you say "the prayer movement," what  
12 do you mean by that?

13 A. Just people that are interested in prayer,  
14 people that -- like we have this initiative, the seven  
15 centers of power, and we get people ordering bookmarks  
16 with the seven centers of power on it and bulletin  
17 inserts. So we can just tell from the mail and the  
18 phone calls that it's grown.

19 Q. Certainly this success in mobilizing a  
20 Christian prayer movement, certainly the task force has  
21 been successful, correct?

22 A. Yes.

23 Q. Do you attribute any of that success to the  
24 fact that there is a designated day of prayer?

25 A. Yes, because it unifies people of faith. You

22 (Pages 82 to 85)

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1 know, we have students gather around the flagpoles on  
2 the National Day of Prayer. Some little children have  
3 prayers on that day, and, you know, it's good to have  
4 something to -- you know, a central theme or a central  
5 event that people can gather around, such as we  
6 celebrate a lot of special days in our country.

7 Q. Now, in terms of the activities that are  
8 organized by the task force, though, and the volunteers  
9 that you engage, my understanding is that those  
10 volunteers must subscribe to the Christian-Judeo that  
11 the task force adheres to; is that correct?

12 A. That's correct.

13 Q. Has that always been the case?

14 A. Yes.

15 Q. My understanding is that the volunteers have  
16 to sign something acknowledging that.

17 A. I'm not aware of that. You would have to ask  
18 John Bornschein as an administrative --

19 Q. But certainly a limitation on your volunteer  
20 base of people who do subscribe to the Christian-Judeo  
21 precepts that the task force believes in, you do  
22 understand that to be a requirement, correct?

23 A. Correct. We have a separate 501(c)(3), and we  
24 are funded by people of this persuasion. So, of  
25 course, we would want our volunteers to be conducting

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1 their prayer gatherings, you know, in the same  
2 tradition.

3 Q. Now, is the tradition and the beliefs and the  
4 expression that is promoted by the task force, does  
5 that have any relationship to the Lausanne Covenant?

6 A. Yes.

7 Q. And can you tell me what the Lausanne -- am I  
8 pronouncing it right, by the way?

9 A. Uh-huh.

10 Q. Can you tell me what the Lausanne is, as you  
11 understand it?

12 A. You would have to ask Mrs. Vonette Bright that  
13 question.

14 Q. I would have to ask her what you understand it  
15 to be?

16 A. No. What she understood it to be.

17 Q. My question right now, though, is: Do you  
18 have an understanding of what the Lausanne Covenant  
19 is?

20 A. Not really.

21 Q. It's really nothing that you could describe  
22 for me?

23 A. Not really. I know the National Prayer  
24 Committee came out of the Lausanne committee meeting,  
25 and I believe Billy Graham was there, and I don't know,

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1 many different religious leaders. But other than that,  
2 I don't know much about it.

3 Q. And is the Lausanne Covenant something that  
4 has been adopted by some religious body? In other  
5 words, who are the people that signed off on the  
6 Lausanne Covenant?

7 A. I don't know. I'm sure Mrs. Bright did, but I  
8 don't know of the others. I don't know who attended  
9 that conference.

10 Q. Okay. So the Lausanne Covenant, though, is  
11 not something that was adopted by any organized

12 religious entity itself?

13 A. Not that I know of.

14 Q. And is it the Lausanne Covenant that the task  
15 force subscribes to then?

16 A. I don't know. Since we're a project of the  
17 National Prayer Committee, and if they subscribe to it,  
18 I assume that we have to be at least on board.

19 Q. The relationship with the Lausanne Covenant to  
20 the task force, am I the first person to suggest that  
21 there is some relationship to you?

22 A. Yes.

23 Q. You've never heard that relationship expressed  
24 before?

25 A. No.

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1 Q. But certainly you had heard of the Lausanne  
2 Covenant before?

3 A. Yes, I have. I believe it's on our Website.

4 Q. Well, I've tried to read everything on your  
5 Website, but I may have missed it.

6 A. I'm not sure, but it may be.

7 Q. Have you selected an annual theme for 2010?

8 A. Not yet.

9 Q. And who will be involved in that selection  
10 process? Is that basically something that ultimately  
11 you're responsible for?

12 A. Yes.

13 Q. Now, my understanding is that in 2009,  
14 President Obama participated much less in any organized  
15 National Day of Prayer activities than his  
16 predecessors; is that correct?

17 A. That's correct.

18 Q. He was certainly invited to participate --  
19 well, did the task force invite him to participate in  
20 any activities?

21 MR. ROSENBERG: Objection.

22 A. No. All we asked for from President Obama was  
23 for a proclamation. We requested it.

24 Q. (BY MR. BOLTON) Were you disappointed that  
25 President Obama engaged in a less visible promotion of

23 (Pages 86 to 89)

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<p>1 the day of prayer after he was elected?</p> <p>2 MR. THERIOT: Objection, vague.</p> <p>3 A. I was happy with the proclamation that he</p> <p>4 wrote.</p> <p>5 Q. (BY MR. BOLTON) Okay. But were you unhappy</p> <p>6 about anything?</p> <p>7 MR. THERIOT: You know, I object because it's</p> <p>8 vague. You can answer it, if you know.</p> <p>9 Q. (BY MR. BOLTON) I'm not asking about anything,</p> <p>10 you know, including the price of produce. My question</p> <p>11 was more limited to what we were talking about. We</p> <p>12 were talking about President Obama. It may not come as</p> <p>13 a surprise to you, but you and your husband were at</p> <p>14 least quoted as expressing disappointment in the</p> <p>15 President. Are you hearing that for the first time?</p> <p>16 A. No.</p> <p>17 Q. And did you, in fact, express disappointment</p> <p>18 with the President?</p> <p>19 A. I never talked to the President, but, of</p> <p>20 course, I was disappointed because former presidents</p> <p>21 have celebrated the National Day of Prayer in some way.</p> <p>22 So I was hoping President Obama would celebrate our</p> <p>23 nation's day of prayer in some tangible way.</p> <p>24 Q. He did issue the proclamation, though,</p> <p>25 correct?</p>	<p>1 A. No, no. I wasn't clear then.</p> <p>2 BY MR. BOLTON: Can you read back the</p> <p>3 question?</p> <p>4 (The requested question was read back by the</p> <p>5 reporter.)</p> <p>6 A. Are what you saying is, do I think it's</p> <p>7 important that the President sign a proclamation?</p> <p>8 Q. (BY MR. BOLTON) Yes.</p> <p>9 A. I do.</p> <p>10 Q. And why is that?</p> <p>11 A. Well, he is the leader of our country, and</p> <p>12 many people look to the President as the moral leader</p> <p>13 and sometimes even the spiritual leader. And since</p> <p>14 this is a day set aside by Congress for the American</p> <p>15 people, he's the leader of the American people, we</p> <p>16 would like to see him encourage people of all faiths to</p> <p>17 pray on that day.</p> <p>18 MR. THERIOT: Rich, it's been an hour. Do you</p> <p>19 want to take a few minutes?</p> <p>20 MR. BOLTON: That's fine.</p> <p>21 (A brief break was taken.)</p> <p>22 Q. (BY MR. BOLTON) Now, the task force, as we</p> <p>23 discussed, has maintained a Website, correct?</p> <p>24 A. That's correct.</p> <p>25 Q. Am I correct that it's described as the</p>
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<p>1 A. Yes. It was a good proclamation.</p> <p>2 Q. And it encouraged -- whether he was out front</p> <p>3 engaged in corporate activities, he certainly</p> <p>4 encouraged people to pray in their own way, correct?</p> <p>5 A. Correct.</p> <p>6 Q. And certainly prayer can be done on an</p> <p>7 individual basis without corporate activities,</p> <p>8 correct?</p> <p>9 A. Of course.</p> <p>10 Q. And, in fact, the task force was successful in</p> <p>11 mobilizing around the National Day of Prayer</p> <p>12 designation even without the President engaging in</p> <p>13 activities such as his predecessors had, correct?</p> <p>14 A. Correct. The National Day of Prayer doesn't</p> <p>15 belong to any one man. It belongs to the American</p> <p>16 people.</p> <p>17 Q. And central to that, then, is the designation</p> <p>18 by the President in the proclamation of the day,</p> <p>19 correct?</p> <p>20 MR. THERIOT: Objection, vague.</p> <p>21 A. (Witness indicating in the affirmative.)</p> <p>22 Q. (BY MR. BOLTON) You nodded. Was that a yes?</p> <p>23 A. I'm not sure. Can you restate it? I'm not</p> <p>24 sure what your question was.</p> <p>25 Q. But until you heard the objection --</p>	<p>1 official Website of the National Day of Prayer?</p> <p>2 A. I think you'll see National Day of Prayer Task</p> <p>3 Force.</p> <p>4 Q. Pardon me?</p> <p>5 A. I believe it says "National Day of Prayer Task</p> <p>6 Force."</p> <p>7 Q. And this may be a little bit tedious. What</p> <p>8 I'm going to do now is ask you to identify some</p> <p>9 documents, and I'll ask a few questions about a number</p> <p>10 of them, but more than anything, we're in the process</p> <p>11 right now of just identifying and getting a little bit</p> <p>12 of description.</p> <p>13 MR. BOLTON: Tom, the first document is from</p> <p>14 the task force Website, and it discusses their mission</p> <p>15 and vision and values that you'll get a copy of with</p> <p>16 the transcript, but that's the first document that</p> <p>17 we're marking.</p> <p>18 MR. BELLAVIA: Thank you.</p> <p>19 (Exhibit 1 was marked for identification.)</p> <p>20 Q. (BY MR. BOLTON) Exhibit 1 is from the task</p> <p>21 force Website; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. Have you seen this before?</p> <p>24 A. Yes.</p> <p>25 Q. And were you involved with the articulation of</p>



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1 the mission statement for the task force?

2 A. No.

3 Q. Do you know whether that mission statement  
4 came from the National Prayer Committee?

5 A. I would imagine the National Prayer Committee,  
6 along with maybe members of the task force, put this  
7 together.

8 Q. Were you involved at all in putting this  
9 together or reviewing it to see if it accurately stated  
10 the task force's position?

11 A. No.

12 Q. Have you ever seen it before?

13 A. Yes.

14 Q. And, to your knowledge, does it accurately  
15 state the mission and vision and values of the task  
16 force?

17 A. It does.

18 Q. Now, the task force Website also includes a  
19 variety of other pages. Have you, to your knowledge,  
20 looked at all of what's on your Website?

21 A. I haven't, because I'm not a techie. I  
22 usually have to have somebody pull it up for me.

23 Q. Looking at Exhibit 1, by the way, where it  
24 says -- on the left-hand side, there's some description  
25 of different pages. Do you see that, where it says at

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1 the very top, it says, "About NDP"?

2 A. Yes.

3 Q. So, certainly, the task force, in its Website,  
4 shortens the description of the entity to just NDP  
5 rather than task force, correct?

6 A. Well, I think if you look at the entire page,  
7 it alludes to the task force.

8 Q. Pardon?

9 A. I think if you look at the entire page --  
10 let's see. Well, if you take the Website in context,  
11 many, many times it says "National Day of Prayer Task  
12 Force."

13 Q. Okay. But certainly in the description of the  
14 different pages, it's shortened to just NDP, correct?

15 A. Correct.

16 Q. And then we discussed the logo. One of the  
17 logos at least, that's shown up in the upper left-hand  
18 corner of Exhibit 1, correct?

19 A. Correct.

20 Q. And that's probably the most common logo that  
21 is used by the task force, correct?

22 A. Correct.

23 Q. And certainly -- go ahead.

24 A. Not in its entirety. Our logo doesn't include  
25 "Official Website."

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1 Q. That's a good point. Normally what it just  
2 has is the flag and the National Day of Prayer on  
3 different documents, correct?

4 A. And on different documents, it says -- it has  
5 the flag and National Day of Prayer Task Force.

6 Q. Okay.

7 MR. THERIOT: And, incidentally, I want to  
8 object to this document to the extent I don't think  
9 it's clear from the document itself, but the task force  
10 is included in the logo up there.

11 MR. BOLTON: Pardon me?

12 MR. THERIOT: The task force is included on  
13 the Website in the logo up there. It's just not  
14 reflected in this document because it's just not a  
15 great copy.

16 MR. ROSENBERG: It's very faint.

17 A. It's underneath the flag, I think.

18 Q. (BY MR. BOLTON) I'm not seeing it, but I will  
19 look. It does say, though, that it is the "National  
20 Day of Prayer Official Website," correct?

21 A. It is the official Website for the  
22 Judeo-Christian expression of the National Day of  
23 Prayer.

24 Q. Okay. And, certainly, National Day of Prayer  
25 is in much -- can we agree that it is in much larger

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1 type than the reference to the task force?

2 A. Yes.

3 Q. In terms of the inclusion of the American flag  
4 on the logo, to you, is the inclusion of the American  
5 flag on the logo, is that significant?

6 A. I believe it is, because it represents  
7 America.

8 Q. And so, certainly, there is an attempt then to  
9 associate the National Day of Prayer Official Website  
10 of the task force with this being an American day that  
11 is being honored?

12 A. It is our nation's day of prayer.

13 Q. There are other pages on the Website, on the  
14 NDP Task Force website, that discuss such things as  
15 prayer and what makes for effective prayer, correct?  
16 Not on the exhibit that you have, but you're familiar  
17 with the Website, correct?

18 MR. THERIOT: Objection. She's actually  
19 testified that she's not that familiar with it, is my  
20 understanding.

21 Q. (BY MR. BOLTON) Okay. I may have  
22 misunderstood. You have viewed or not viewed your  
23 Website?

24 A. Parts of it.

25 Q. Are you aware of a page that's entitled "What

25 (Pages 94 to 97)

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1 Makes Prayer Work?"

2 A. I have not seen that page.

3 Q. How about a page entitled "Why We Pray"?

4 A. I have not seen that page.

5 Q. And so if I asked you about them in terms of

6 any personal familiarity with those pages, you would

7 not have any familiarity; is that correct?

8 A. What do you call the first page -- help me out

9 here -- when you open up somebody's Website?

10 MR. THERIOT: Home page.

11 A. The home page I'm familiar with, but not the

12 different links.

13 Q. (BY MR. BOLTON) In terms of "What Makes Prayer

14 Work," though, it begins by saying, "It's all about a

15 relationship," and you would agree with that,

16 correct?

17 A. A relationship with the Holy God.

18 Q. On the page entitled "Why We Pray," there's a

19 statement that it is the goal -- "It's our goal," which

20 would be the task force's goal, "that you, your family

21 and friends would participate in the National Day of

22 Prayer. We pray that the event impacts your life, and

23 that praying for our nation moves from a one-day event

24 to a lifetime endeavor. So join us on the first

25 Thursday of May and pray with conviction that God would

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1 continue to shed his grace on thee." Is that a

2 statement that you would agree with?

3 A. I would agree with that.

4 Q. There's a page entitled "Definition of

5 Judeo-Christian," and that is included, I assume, as a

6 reference for the orientation of the task force,

7 correct?

8 A. Are you referring still to the Website?

9 Q. Pardon?

10 A. Are you referring to the Website page?

11 Q. This is a definition from a page on your

12 Website.

13 A. I would have to read it.

14 Q. Okay.

15 (Exhibit 2 was marked for identification.)

16 A. I would agree.

17 Q. (BY MR. BOLTON) That is an accurate statement

18 of the orientation of the task force?

19 A. Yes.

20 Q. It states that the task force uses the term,

21 "With reference to the standard of morality and family

22 values which is common to both the Old and New

23 Testaments, and which has over the centuries formed the

24 foundation for ethics and culture in Western society."

25 Do you see that?

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1 A. Yes, I do.

2 Q. Now, my understanding is that, in a variety of

3 contexts, the task force has expressed its position on

4 some moral and political issues; is that correct?

5 MR. ROSENBERG: Objection to form.

6 Q. (BY MR. BOLTON) Has the task force -- with

7 reference to that standard of morality, that would

8 include, for instance, issues such as their views on

9 homosexuality?

10 A. No. We are apolitical.

11 Q. What about -- well, let me back up. What do

12 you mean by "apolitical"?

13 A. We don't get involved in political issues.

14 We're about prayer. We're not about, you know,

15 homosexuality or abortion or any of those issues.

16 Q. So you would say that those are political

17 issues rather than issues that relate to a standard of

18 morality and family values that you associate with the

19 Old and New Testaments?

20 A. Well, they certainly affect the family and I

21 do think they are moral issues, but that has nothing to

22 do with the task force and our job to mobilize

23 prayer.

24 Q. Pardon?

25 A. That has nothing to do with the task force and

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1 our job to mobilize prayer.

2 Q. But in terms of the definition of

3 Judeo-Christian that is provided in your Website then,

4 when you say that you use it, "With reference to a

5 standard of morality and family values, which is common

6 to both the Old and New Testaments," my understanding

7 is that that is the expression then, the

8 Christian-Judeo expression, that is forwarded by the

9 task force, correct?

10 A. Your question is vague.

11 Q. Pardon?

12 A. Your question is vague.

13 MR. THERIOT: Objection, question vague. You

14 can ask him to repeat it. I should have objected,

15 you're right.

16 A. Okay. I'm not quite clear.

17 Q. (BY MR. BOLTON) Okay. Well, I'm not sure

18 what -- my understanding is that you provide a

19 definition of Judeo-Christian, which, as I understand,

20 is the expression that is forwarded by the task force

21 in the activities that it engages in, correct?

22 A. I would say that's correct.

23 Q. Pardon?

24 A. I would say that's correct.

25 Q. Okay. And the term "expression of

26 (Pages 98 to 101)

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<p>1 Judeo-Christian precepts" was actually a phrase that I</p> <p>2 believe you first used too; is that correct?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. So when you say "expression of</p> <p>5 Judeo-Christian values," I guess I'm not sure what you</p> <p>6 mean because, on the one hand, you say that prayer has</p> <p>7 nothing to do with any of these things, and yet, on the</p> <p>8 other hand, you tell me that it is utilizing</p> <p>9 Judeo-Christian expression.</p> <p>10 MR. THERIOT: Objection. That</p> <p>11 mischaracterizes her testimony.</p> <p>12 A. Well, if you read here, it says, "The meaning</p> <p>13 of the term like 'Judeo-Christian' depends much on the</p> <p>14 intention or the interpretation of the speaker or</p> <p>15 writer who uses it. We routinely use it." And then it</p> <p>16 goes on to say, you know, reference to that standard of</p> <p>17 morality. So Judeo-Christian literally means Old</p> <p>18 Testament and New Testament, the God of the Bible, and</p> <p>19 so that is our expression.</p> <p>20 Q. And the expression being the standard of</p> <p>21 morality and family values that is expressed in the Old</p> <p>22 and New Testaments?</p> <p>23 A. Correct.</p> <p>24 Q. And that is the expression that is utilized by</p> <p>25 the task force in its NDP-organized activities,</p>	<p>1 correct?</p> <p>2 A. I wouldn't say commands it. You know, the Old</p> <p>3 Testament scripture says that, I would but men</p> <p>4 everywhere would lift up all their hands in prayer." I</p> <p>5 think prayer gives strength to the inner man, I believe</p> <p>6 it brings God's blessing not only on individuals but on</p> <p>7 nations, and I think prayer is very important.</p> <p>8 Q. Does it change outcomes?</p> <p>9 A. I think it does.</p> <p>10 Q. So do you believe that there are outcomes in</p> <p>11 our history that have been affected by your view that</p> <p>12 we are -- well, do you hold a view that we are</p> <p>13 essentially a Christian nation?</p> <p>14 MR. THERIOT: Objection, asked and answered.</p> <p>15 MR. ROSENBERG: And objection to form.</p> <p>16 MR. THERIOT: So it's the last part of the</p> <p>17 question that you wanted her to answer, right, the "Do</p> <p>18 you agree that we're a Christian nation"?</p> <p>19 MR. BOLTON: Right.</p> <p>20 A. I agree that we were founded on Christian</p> <p>21 principles.</p> <p>22 Q. (BY MR. BOLTON) Do you believe that those</p> <p>23 Christian values have influenced the course of the</p> <p>24 nation's history?</p> <p>25 A. I do.</p>
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<p>1 correct?</p> <p>2 A. You would say the Bible is our handbook.</p> <p>3 Q. That's the extent of the expression, of</p> <p>4 Judeo-Christian expression?</p> <p>5 A. Well, I imagine the Jewish religion has</p> <p>6 another expression, and Judeo-Christian is Protestant,</p> <p>7 Catholic and Jewish.</p> <p>8 Q. Do you believe that there is a need to pray,</p> <p>9 that everyone should pray?</p> <p>10 A. Well, the last Barna research shows that</p> <p>11 88 percent of Americans pray, and 82 believe that</p> <p>12 prayer is answered.</p> <p>13 Q. So you would say that whether or not there's a</p> <p>14 need to pray is a function of the survey, or are you</p> <p>15 saying -- I mean, what I want to get at isn't whether</p> <p>16 or not most people pray or not. Is it your position</p> <p>17 that people should pray, that they need to pray?</p> <p>18 A. Yes.</p> <p>19 Q. Pardon?</p> <p>20 A. Yes.</p> <p>21 MR. ROSENBERG: Objection, form. It's a</p> <p>22 compound question.</p> <p>23 Q. (BY MR. BOLTON) And one of the reasons that</p> <p>24 you believe there is a need to pray is because the God</p> <p>25 that you believe in commands that his followers pray,</p>	<p>1 Q. In a positive or a negative way?</p> <p>2 A. Positive.</p> <p>3 Q. And is it your view that if the nation strays</p> <p>4 from Christian values, that less favorable outcomes</p> <p>5 will occur?</p> <p>6 A. I agree.</p> <p>7 (Exhibit 3 was marked for identification.)</p> <p>8 Q. (BY MR. BOLTON) Mrs. Dobson, we've marked a</p> <p>9 document entitled Exhibit 3. Are you familiar with</p> <p>10 that document?</p> <p>11 A. Yes.</p> <p>12 Q. And can you describe it or identify it?</p> <p>13 A. It's a letter to the governor.</p> <p>14 Q. Now, the letter that we have is dated -- it</p> <p>15 shows the date of January 22 of 2009, correct?</p> <p>16 A. Correct.</p> <p>17 Q. And it says, "Dear Governor," and then it</p> <p>18 says, "Last name." This is a form letter that was sent</p> <p>19 to all of the governors?</p> <p>20 A. Yes.</p> <p>21 Q. And it was sent to all of the governors in</p> <p>22 anticipation of the 2009 National Day of Prayer; is</p> <p>23 that correct?</p> <p>24 A. Yes.</p> <p>25 Q. And in the first paragraph, at the end of the</p>

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1 first paragraph -- and by the way, this is an aside,  
 2 this letter would have been signed and went out over  
 3 your signature, correct?  
 4 A. Correct.  
 5 Q. And this would have been sent to all of the  
 6 governors?  
 7 A. Correct, yes.  
 8 Q. The last sentence of the first paragraph makes  
 9 reference to "proclaiming reliance on an Almighty God  
 10 and calling Americans to come before Him on behalf of  
 11 our nation." Is that, at least from the perspective of  
 12 the task force, one of the things that you think is  
 13 desirable about the National Day of Prayer as  
 14 designated by the President that you say, it behooves  
 15 us to honor the precedent established by presidents and  
 16 leaders, proclaiming reliance on an Almighty God and  
 17 calling Americans to come before Him on behalf of our  
 18 nation. Is that what you understand the National Day  
 19 of Prayer is about?  
 20 A. Yes.  
 21 Q. And then in the second paragraph toward the  
 22 end, you indicate what the NDP task force theme is and  
 23 the supporting scripture, correct?  
 24 A. Correct.  
 25 Q. And then in the next paragraph, you ask the

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1 governors to lend their support through a public  
 2 proclamation declaring May 7th, 2009 as the National  
 3 Day of Prayer, correct?  
 4 A. Correct.  
 5 Q. And so certainly the proclamations issued by  
 6 the governors, then, as you understand it, are a form  
 7 of lending support to the National Day of Prayer and  
 8 what it has come to stand for?  
 9 A. Lending support in our nation's day of prayer,  
 10 yes.  
 11 (Exhibit 4 was marked for identification.)  
 12 MR. THERIOT: There's not a question pending,  
 13 is there?  
 14 MR. BOLTON: No.  
 15 Q. (BY MR. BOLTON) Have you looked at the  
 16 document?  
 17 A. I have.  
 18 Q. Exhibit 4 is a document that you're familiar  
 19 with?  
 20 A. Yes.  
 21 Q. It's a form letter that you sent out in  
 22 January of 2009 to your various state coordinators; is  
 23 that correct?  
 24 A. I don't know who it went to. I'm sure it went  
 25 to the state coordinators, but it also could be --

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1 let's see. Let me just finish reading this.  
 2 Q. In the third paragraph, it says, "In your role  
 3 as a state coordinator."  
 4 A. Yes, then it went to the state coordinators.  
 5 Q. This is a letter that you would have -- did  
 6 you write it?  
 7 A. This was written with Master Writers.  
 8 Q. And the letter reflects your views, though,  
 9 correct?  
 10 A. Yes.  
 11 Q. In the first paragraph, you indicate that,  
 12 "The overwhelming response last year," which would have  
 13 been 2008, "was deeply encouraging," and that you  
 14 anticipate even greater involvement in 2009; is that  
 15 correct?  
 16 A. That's correct.  
 17 Q. When you say the response last year and the  
 18 involvement was great, what do you mean by that?  
 19 A. Number of prayer gatherings.  
 20 Q. Okay. In the third paragraph of Exhibit 4,  
 21 you state, "As in the past, it is critical that we  
 22 garner the support of our nation's leaders for our  
 23 efforts." Do you see that?  
 24 A. I do.  
 25 Q. And do you agree with that statement?

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1 A. I do.  
 2 Q. When you say "it is critical," what do you  
 3 mean by that?  
 4 A. Well, I believe that people look to their  
 5 leaders in giving them direction. So I think it's  
 6 critical that the leaders do support this nation's day  
 7 of prayer because they're role models to their  
 8 people.  
 9 Q. And so in terms of the overwhelming response  
 10 in terms of the number of prayer events that the task  
 11 force has been organizing, you would agree, then, that  
 12 the proclamations issued by the various public  
 13 officials is important to getting the response that  
 14 you've been getting?  
 15 A. That's not what it was -- it was not meant by  
 16 "response" that the governors were signing  
 17 proclamations. It just meant that there was more  
 18 involvement at the grass-roots level, more response,  
 19 more prayer gatherings.  
 20 Q. Okay. But in terms of facilitating that  
 21 involvement, is there any relationship, then, to the  
 22 support of the nation's leaders for your efforts? I  
 23 mean, do you get better participation in these events  
 24 by getting support from national leaders?  
 25 A. No. I think we would have the same support

28 (Pages 106 to 109)



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1 without them.

2 Q. So your view is, if the governors, for  
3 instance, issued no proclamations, it would have no  
4 effect on the organizing activities of the -- or the  
5 mobilizing activities of the task force?

6 A. We would still have prayer gatherings, but I  
7 think the people of their state would be very  
8 disappointed if they didn't acknowledge the National  
9 Day of Prayer in some way.

10 Q. And why do you say that?

11 A. Just from the feedback from our state  
12 coordinators, that if a governor doesn't sign a  
13 proclamation, that people are disappointed. They hear  
14 from their constituents.

15 Q. And in terms of garnering the support of  
16 leaders for your efforts, I mean, what is it that -- I  
17 mean, is the issuing of a proclamation an example of  
18 garnering such support?

19 A. Well, the first Thursday of May is our  
20 National Day of Prayer, and, you know, we hope that the  
21 leaders of our country will call the nation to prayer.  
22 But, again, we can request it, but that's all we can  
23 do.

24 Q. And, in fact, when you say that, "It is  
25 critical to garner the support" in the next sentence of

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1 Exhibit 4, you state that the role of the  
2 coordinator -- or part of the role -- is to help in  
3 obtaining a written proclamation from the governor of  
4 the particular state coordinator's state, correct?

5 A. Uh-huh.

6 Q. In fact, you suggest encouraging a personal  
7 visit to the governor's office, correct?

8 A. Yes. If they do not write a proclamation, we  
9 ask them to set up an appointment at the governor's  
10 office and, you know, request it as a follow-up.

11 Q. And then in Paragraph 4 of Exhibit 4, you urge  
12 the state coordinators to invite each governor of their  
13 particular state to actively participate in an NDP  
14 observance, most appropriately on the steps of the  
15 capitol building. Again, the reason for asking for  
16 that involvement, and particularly on the steps of the  
17 capitol building, is in order to give visibility to the  
18 occasion?

19 A. Well, part of our mission statement is that we  
20 are trying to mobilize people to pray for their leaders  
21 and for America. So when a mayor or a governor decides  
22 to participate, we like that because we can pray for  
23 them and we can pray for their families and for  
24 whatever their needs are. The only reason we would  
25 like them to participate is so we can pray for them.

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1 Q. I see. So when you say you invite the  
2 governors to actively participate, most appropriately  
3 on the steps of the capitol building, it is so that  
4 they can be there when they're being prayed for?

5 A. Correct.

6 Q. And then the next sentence in that paragraph  
7 where you say, "In order to maintain your  
8 credibility -- and that of the NDP task force" --

9 A. Where is that? Oh, right here. I see it.

10 Q. You say, "It is imperative that such an event  
11 involve a well-organized, substantial assembly." Do  
12 you see that?

13 A. Yes.

14 Q. And that's because you want the governor to  
15 know that the prayer for him is well-organized?

16 (A brief break was taken to reconnect  
17 telephone communication with Mr. Bellavia.)

18 Q. (BY MR. BOLTON) What you were telling me,  
19 Mrs. Dobson, is that the reason you are seeking the  
20 governors' active participation in NDP observances is  
21 so that you can pray for the individual governor or  
22 government official?

23 A. We always gather around and pray for the  
24 governor, if he attends an event. He's always prayed  
25 for, and, you know, the state legislature is prayed

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1 for, any leaders in that particular venue are prayed  
2 for. They're prayed for when the governor doesn't show  
3 up, but it's always nice if he does decide to  
4 participate.

5 Q. And you state that in order to maintain the  
6 coordinators' credibility and that of the NDP task  
7 force, that it's imperative that such an event, one  
8 involving the governor, and preferably on the steps of  
9 the capitol building, be well-organized and have a  
10 substantial assembly?

11 A. Well, we don't want to invite the governor out  
12 to two people on the capitol steps. We want to have a  
13 good showing.

14 Q. But the fact of the matter is, you do want  
15 these public officials to show up and participate in  
16 these observances, correct?

17 A. We would like to pray for them.

18 Q. Now, I mean, my understanding is that you also  
19 would like these government officials to speak at the  
20 occasion also, right?

21 A. That's up to them.

22 Q. Well, I understand it's up to them. My  
23 question was: Would you like them to participate by  
24 speaking at these observances?

25 A. We would like them to support prayer.

29 (Pages 110 to 113)

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1 Q. And, certainly, that goes beyond just  
2 attending these functions so that they can be prayed  
3 for, right? Attendance at these occasions isn't just  
4 so that they can be an object of prayer, right?

5 A. We would like for them to speak about the  
6 nation's day of prayer, and then we would like to pray  
7 for them also, but what the governor does at these  
8 events is totally up to them. We can't dictate it. We  
9 can request it only.

10 (Exhibit 5 was marked for identification.)

11 Q. (BY MR. BOLTON) Exhibit 5, Mrs. Dobson, is the  
12 letter that you sent to President Obama this year,  
13 correct?

14 A. Correct.

15 Q. And you requested his support for the National  
16 Day of Prayer, correct?

17 A. Correct.

18 Q. And in the third paragraph of your letter, you  
19 state, "An integral part of this yearly national  
20 observance is the official presidential proclamation  
21 issued by the White House," correct?

22 A. Correct.

23 Q. And in terms of that, in terms of the  
24 observances that you're organizing, that presidential  
25 proclamation, having it in hand, is very important,

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1 correct?

2 A. It is, but presidents throughout our history  
3 have called for a National Day of Prayer.

4 Q. And you go on to state that, "In recent years,  
5 the NDP Task Force has worked with the Clinton and Bush  
6 administrations to craft the wording for the  
7 presidential proclamation." And you talked about that  
8 earlier, correct?

9 A. Correct.

10 Q. And, in fact, you apparently sent a proposed  
11 draft of a presidential proclamation to President  
12 Obama, correct?

13 A. Yes.

14 Q. I don't believe I actually received a copy of  
15 the draft proclamation that you sent to the President.

16 A. I can get it for you.

17 Q. Pardon?

18 A. I can get it for you.

19 Q. Let me ask, not having seen it, would I be on  
20 pretty solid ground guessing that it includes some  
21 reference to this year's theme and the supporting  
22 scripture?

23 A. As I said earlier, our letters that go out  
24 around the National Day of Prayer always state the  
25 theme and the supporting scripture.

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1 Q. The letters like this one that you sent to  
2 President Obama?

3 A. It always includes the theme and the  
4 supporting scripture.

5 Q. But you also indicated that you're not  
6 really -- that you make no effort to persuade or push  
7 government officials to include the annual theme and  
8 the supporting scripture in their own proclamation,  
9 correct?

10 A. Correct.

11 Q. What I'm getting at is, the draft of the  
12 proclamation that you sent to President Obama, that is  
13 the draft that, if you had your druthers, he would use,  
14 right?

15 A. It's to really help the writers. If they  
16 don't have to craft a proclamation for the President,  
17 this is just one they can look at, and it makes it  
18 easier for them.

19 Q. Sure. And not having seen it, what I was  
20 speculating, though, is this form that you sent to the  
21 President, did it include this year's theme and  
22 supporting scripture?

23 A. I don't know. I have to look at that.

24 Q. And you said that that's something that you  
25 could lay your hands on fairly readily?

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1 A. Yes.

2 MR. ROSENBERG: Rich, I actually think I have  
3 a copy, if that's helpful.

4 MR. BOLTON: Oh, good.

5 (Exhibit 6 was marked for identification.)

6 MR. ROSENBERG: Just to be clear, this was a  
7 document that was produced by Mrs. Dobson. I don't  
8 want to make any representations as to the document.

9 Q. (BY MR. BOLTON) So Exhibit 6, then, is the  
10 letter and the proposed proclamation; is that  
11 correct?

12 A. Yes. The top sheet is requesting a  
13 proclamation, and the second one is his actual  
14 proclamation.

15 Q. And I'm just looking at it. It doesn't look  
16 like you included the annual theme in this particular  
17 proclamation; is that correct?

18 MR. THERIOT: He's asking about -- I think we  
19 need to clear something up. My understanding is,  
20 you're testifying that this is not your proposed  
21 proclamation.

22 THE WITNESS: No, no. They didn't use  
23 anything that we sent.

24 Q. (BY MR. BOLTON) Say that again.

25 A. President Obama's team did not use any part of

30 (Pages 114 to 117)

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<p>1 the draft that we sent them. This is his actual 2 proclamation. 3 Q. Oh, okay. Okay. I see. 4 MR. ROSENBERG: Maybe we should go off the 5 record for a second. 6 (An off-the-record discussion was held.) 7 Q. (BY MR. BOLTON) Is it fair to say, 8 Mrs. Dobson, that whether or not the second page to 9 Exhibit 6 was the actual draft proclamation that you 10 sent to President Obama, you just don't know? 11 A. I don't know.</p>	<p>1 correct? 2 A. Yes. 3 Q. And presumably at the time that you wrote this 4 letter, you intended to be accurate in the information 5 that you were conveying to the President, correct? 6 A. That's correct. But, again, I worked with 7 Master Writers on crafting these letters, and they 8 usually do the background check on it. So if it says 9 Clinton, then we probably did send a draft. 10 Q. So the facts stated in this letter, there was 11 some effort to actually verify the accuracy of the</p>
<p>12 Q. Okay. You've got Exhibit 6 right in front of 13 you, though? 14 A. I do. 15 Q. In the third paragraph of the letter that you 16 wrote to President Obama, and that would be the first 17 page of Exhibit 6 -- or Exhibit 5 that we were just 18 looking at, this, though, was a letter that you 19 actually did send to the President, correct? 20 A. Yes. 21 Q. And what you're proposing to do there was what 22 you had done in recent years with the Clinton and Bush 23 administrations in terms of helping to craft the 24 wording of the presidential proclamation? 25 A. We sent them a draft, yes.</p>	<p>12 statements? 13 A. They usually did a background check. 14 Q. In a letter that you wrote to Representative 15 Michael Bachmann -- 16 A. Michele Bachmann. 17 Q. I'm sorry. Michele Bachmann, that's somebody 18 that you know, correct? 19 A. I do know her. 20 Q. And she's worked with you -- she's attended 21 National Day of Prayer activities in D.C. in the 22 past? 23 A. The Cannon House office building is open to 24 our representatives to drop in and have prayer if they 25 choose, and Michele Bachmann has dropped in from time</p>
Page 119	Page 121
<p>1 MR. ROSENBERG: Objection as to which Bush 2 administration. Also, compound for Clinton and Bush. 3 MR. BOLTON: Say that again. 4 MR. ROSENBERG: Objection because you referred 5 to the Bush administration. Which Bush administration? 6 And compound as to Bush and Clinton. I'm not sure we 7 ever established what role, if any, the National Day of 8 Prayer Task Force played regarding the Clinton 9 administration. 10 Q. (BY MR. BOLTON) Well, in the letter that we're 11 looking at there that you wrote to President Obama, you 12 wrote that, "In recent years, the NDP Task Force has 13 worked with the Clinton and Bush administrations to 14 draft the wording for the presidential proclamation." 15 You wrote that, correct, in the third paragraph? 16 A. Let me see. Correct. 17 Q. And that was a correct statement? 18 A. If by sending a draft means craft, yes. 19 Q. And that would have been true for -- I mean, 20 I'm not saying that they adopted it or anything, but 21 you sent drafts to both the Clinton administration and 22 the Bush administration, correct? 23 A. We have to the Bush administrations. I don't 24 remember if we did to Clinton or not. 25 Q. But you wrote to President Obama that you had,</p>	<p>1 to time in the prayer service. 2 (Exhibit 7 was marked for identification.) 3 Q. (BY MR. BOLTON) Exhibit 7 is the letter that 4 you wrote to Representative Bachmann? 5 A. Yes. 6 Q. And, again, you thank her for agreeing to 7 participate in the NDP observance in 2009, correct? 8 A. As stated before, we asked for a 9 representative from the judicial, the legislature, the 10 executive branch, and the military, and we asked her to 11 represent the legislature. 12 Q. And in your letter to her, you include a 13 reference to the 2009 theme and supporting scripture, 14 correct? 15 A. In all of our letters that go out for the 16 National Day of Prayer, we put the theme and the 17 supporting scripture on it. 18 Q. And then you state, "There is certainly no 19 better time than now to point Americans to the eternal 20 source of encouragement and help," and that would be 21 the God of your Bible, correct? 22 A. The God of the Bible, yes. 23 Q. And is it your understanding that this year's 24 theme and supporting scripture, that that is how you 25 understand or how you intended that theme and</p>

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<p>1 supporting scripture to be interpreted, as an effort to 2 point Americans to the eternal source of encouragement 3 and help? 4 A. Yes. 5 Q. Pardon? 6 A. Yes. 7 Q. On Page 2 of the letter to Representative 8 Bachmann, you give a little bit of guidance in terms of 9 preparing the message that she would be asked -- as a 10 representative of the House of Representatives, she 11 would be a speaker at the Cannon office building?</p>	<p>1 recount, correct? 2 A. Correct. 3 Q. And she says that, by her count, twice as many 4 congressmen attended this year's event than for the 5 last 12 years that she's been involved. 6 A. Yes. 7 Q. And this was the 2009 prayer day activity, 8 correct? 9 A. Yes. 10 Q. And the next couple of pages in, there's some 11 list. Do you understand that this is the list of the</p>
<p>12 A. Yes. 13 Q. Now, earlier you indicated to me that you 14 didn't ask speakers to describe the role of prayer in 15 their lives, but at least in this particular letter, 16 you did ask that she briefly describe how prayer has 17 played a valuable role in her personal and professional 18 life, correct? 19 A. Correct. 20 Q. And that's language that you include in a lot 21 of these letters to people that are being invited to 22 participate, correct? 23 A. It depends. I know Michele Bachmann 24 personally, I know that she has a deep faith in God, I 25 know that she prays, and so she was asked to share</p>	<p>12 congressmen that attended the Cannon office building? 13 A. Yes. 14 Q. And she lists the names of the individuals 15 that attended and gives their -- it look like she's 16 giving, for most of them at least, their Washington, 17 D.C. official office address, correct? 18 A. Yes. 19 Q. And then she indicates in a parentheses by 20 each name, it looks like an R followed by a state 21 abbreviation. The R, I assume, reflects the party 22 affiliation of the attendees; is that correct? 23 A. Yes. 24 Q. It looks like participation in the Cannon 25 office building -- or attendance at the Cannon office</p>
Page 123	Page 125
<p>1 that, if she chose to. 2 Q. Have you ever had a speaker at the Cannon 3 office building function representing any of the 4 branches of government that you knew did not have any 5 particular religious bent? 6 A. Most of the people that we invite, we know 7 that they are people of faith. 8 Q. And, in fact, that's, quite frankly, one of 9 the characteristics that you seek in speakers at the 10 Cannon office building activities, correct? 11 A. Correct. 12 (Exhibit 8 was marked for identification.) 13 Q. (BY MR. BOLTON) Exhibit 8, I'm guessing you 14 may not have ever seen before, or have you? 15 A. Let me see. Let me just take a moment. I 16 have seen this. 17 Q. You have, okay. And what is it? 18 A. Anne Ryun is former Congressman Jim Ryun's 19 wife, and she was the hostess that helped seat people 20 at the Cannon House office building along with other 21 congressional wives. 22 Q. She doesn't have any official relationship 23 with the task force, correct? 24 A. No. Volunteer. 25 Q. And she's kind of on this postCannon activity</p>	<p>1 building function is primarily a Republican-dominated 2 event. Is that typical? 3 A. I would say we have more Republican 4 congressmen attending than Democrat. Maybe that says 5 something about their prayer life. 6 Q. About what? 7 A. Maybe that says something about their prayer 8 life. 9 Q. I'm missing the last part of it. I'm missing 10 the punch line. 11 A. I said, jokingly, maybe that says something 12 about their prayer life. 13 Q. Oh, yeah, yeah. Well, you should ask them, 14 send them that in next year's letter. 15 A. I would like to say that Democrats -- all 16 Democrats and Republicans are invited. We send out 17 letters of invitation to all of them. 18 (Exhibit 9 was marked for identification.) 19 Q. (BY MR. BOLTON) Exhibit 9 is a letter by you 20 written in August of 2008 to Father Daniel Coughlin; is 21 that correct? 22 A. Correct. 23 Q. And he's the chaplain for the House of 24 Representatives? 25 A. Yes, he is.</p>



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1 Q. And he, apparently, participated in the 2008  
2 activities at the Cannon office building?

3 A. Yes.

4 Q. Had he previously participated, or was this  
5 the first year that he actively participated?

6 A. He's participated before.

7 Q. In the second paragraph of your letter to  
8 Father Coughlin, you comment that, basically, work  
9 never stops, you're working on the '09 observance  
10 already, and you tell him what the prayer theme will be  
11 and the supporting scripture. And then you indicate,

12 in the last sentence of the paragraph, that the theme  
13 for '09 reflects your "conviction that hope for the  
14 future is found only through God's mercy and provision  
15 as his people humble themselves before His throne." Do  
16 you see that?

17 A. Yes.

18 Q. You were sincerely indicating to him how you  
19 understand the theme for '09, you know, how at least  
20 you interpret it and why you chose that theme?

21 A. Yes.

22 Q. Condoleezza Rice, did she participate in the  
23 2008 activities?

24 A. She was invited but couldn't participate. She  
25 was out of the country.

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1 Q. In the letter to her relating to the '08  
2 observance, you stated that the Cannon office building  
3 event is symbolic of thousands of others taking place  
4 throughout the country. Is that one of the reasons for  
5 holding it in the Cannon office building in terms of  
6 the symbolism?

7 A. No. As I said, the event at the Cannon office  
8 building is not any more important than the other  
9 events across the nation. The reason we hold it there  
10 is because it is the seat of our government, and we're  
11 there to pray for our government.

12 Q. And so for that reason, it's certainly  
13 preferable, from your perspective, to have it in the  
14 Cannon office building than, for instance, in a hotel  
15 conference room or something like you -- you said the  
16 night before, you have an event which is more of a  
17 social event, as I understand it, correct?

18 A. Right.

19 Q. But in terms of the actual observance, the  
20 preference would be to have it in a government building  
21 reflecting the seat of our government rather than in  
22 some other sort of conference facility?

23 A. Well, when I took over as chairman, the  
24 precedent had already been set by Vonette Bright to  
25 hold the National Day of Prayer in Washington, D.C. at

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1 either the Dirksen building --

2 Q. Who asked you to do that?

3 A. I said the precedent for being in the  
4 government building in Washington, D.C. was set by  
5 Vonette Bright when she was chairman. And so when I  
6 took over, we just continued that tradition.

7 Q. But you agree with that tradition?

8 A. I do.

9 (Exhibit 10 was marked for identification.)

10 Q. (BY MR. BOLTON) Exhibit 11, is that the  
11 exhibit you're looking at right now?

12 A. Yes.

13 MR. ROSENBERG: Was 10 the Condoleezza Rice  
14 letter? The last one I had was 9.

15 MR. THERIOT: You have actually never  
16 proffered Condoleezza Rice.

17 MR. BOLTON: Did I mark it? Which one are you  
18 missing?

19 MR. ROSENBERG: The last one I have is  
20 Coughlin.

21 MR. BOLTON: 10 was -- yeah, I forgot. Just  
22 for our record, why don't you go ahead and just  
23 identify 10.

24 Q. (BY MR. BOLTON) We've talked about it, but  
25 Exhibit 10 is the letter to Father Coughlin, correct?

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1 MR. ROSENBERG: 9 is Coughlin.

2 MR. THERIOT: Coughlin is 9, and this says  
3 Father Coughlin too.

4 MR. BOLTON: Then I just erred. So,  
5 sequentially then, right now we're missing 10, correct?

6 MR. THERIOT: Correct.

7 MR. BOLTON: And the exhibit that you have  
8 right now marked as Exhibit 11, that's the letter to  
9 Mark McIntyre?

10 MR. THERIOT: Right.

11 MR. BOLTON: Mike McIntyre.

12 MR. THERIOT: So you're going to remark this  
13 one?

14 MR. BOLTON: Why don't we. So 10 is going to  
15 be the McIntyre letter.

16 Q. (BY MR. BOLTON) Exhibit 10, then, is the  
17 letter that you wrote to Representative Mike McIntyre,  
18 correct?

19 A. Correct.

20 Q. And this was before the 2008 observance of the  
21 National Day of Prayer, correct?

22 A. Yes.

23 Q. And Representative McIntyre represented the  
24 House of Representatives then?

25 A. The legislature, yes.

33 (Pages 126 to 129)

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<p>1 Q. Had he participated in the past, 2 Representative McIntyre? 3 A. Yes. 4 Q. And how had he been selected for participation 5 in the past? 6 A. We try to make it fair. We choose a Democrat 7 to represent the legislature one year and a Republican 8 the next year. So he was our Democratic 9 representative. 10 Q. And then in the second paragraph, you asked 11 him also to include a brief description of the 12 significant role prayer has played in his personal and 13 professional life, correct? 14 A. Yes. 15 Q. That actually seems to be fairly typical in 16 the letters that you write to these individuals. 17 A. Well, it is a prayer service. 18 Q. Pardon? 19 A. It is a prayer service. And so when they come 20 over, we like for them to reference prayer in their 21 life. They don't have to, but it is a prayer service. 22 It's about prayer. 23 Q. And the only reason I was making a point of it 24 was because when we talked about that without reference 25 to the letters, you had not recalled that you actually</p>	<p>1 (Exhibit 11 was marked for identification.) 2 Q. (BY MR. BOLTON) Now, Exhibit 11, then, is the 3 letter that you wrote to Chaplain Barry Black, the 4 Senate chaplain, in March of 2008, correct? 5 A. Correct. 6 Q. And that year the Senate chaplain participated 7 in your observance; is that correct? 8 A. Correct. 9 Q. Had he participated previously in any of your 10 observances? 11 A. As a courtesy to both chaplain of the House 12 and the chaplain of the Senate, we alternate. One year 13 the chaplain of the House, one year the chaplain of the 14 Senate. So this was his year. 15 Q. In the letter that you write to him in Exhibit 16 11, you're inviting him to participate -- actually it 17 looks like he's already agreed to participate, and you 18 acknowledge that you're delighted that he will be 19 joining you again "to lead a time of intercession 20 during our Capitol Hill NDP observance on May 1, 2008." 21 What do you mean by that, "lead a time of 22 intercession"? 23 A. Well, intercession is just praying. 24 Q. Pardon? 25 A. Intercession is just praying.</p>
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<p>1 asked people to reflect upon or comment upon the role 2 that religion played in their personal lives. That was 3 the only reason why I drew attention to this. 4 A. Well, I don't think every letter says that, 5 but some do, and the ones that you've brought have. 6 Q. Did you know with regard to Condoleezza Rice 7 whether or not religion had played a -- or prayer had 8 played a significant role in her personal and 9 professional life? 10 A. My understanding of her history is that she 11 came from a very religious family. 12 Q. And the reason I ask is because the same 13 language that we've been talking about is included in 14 the letter that you wrote to her. When you say it's 15 included in some letters, I must say, I haven't seen 16 letters that didn't include that language in terms of 17 the presenters that you anticipated -- or the speakers 18 at the observances. That would make sense because, as 19 you said, this is a prayer service. 20 A. It is. 21 MR. ROSENBERG: Objection. I don't know that 22 there was a question there. 23 MR. BOLTON: Now, if I have these 24 sequentially, is 11 next? 25 MR. THERIOT: Yes, 11 should be next.</p>	<p>1 Q. Okay. 2 A. When you're interceding, you're praying. 3 Q. Okay. And then in the last paragraph of the 4 letter, you thank Chaplain Black for "demonstrating an 5 ongoing deep commitment to lifting our land and its 6 people before the Almighty and encouraging others to do 7 so." What did you mean by that? 8 A. He is the chaplain of the Senate. He is their 9 pastor. And he does have a deep commitment to praying 10 for those senators and their families and praying for 11 the land. So this is just kind of restating what I 12 know his heart is. 13 Q. And his participation in the NDP Task Force 14 observance in the Cannon office building, would that be 15 a continuation of that, that participating in a prayer 16 service, would you construe that to be encouragement 17 for others? 18 MR. THERIOT: Objection, vague. 19 A. Well, they are the religious leaders for the 20 Senate and the House. So I would say that would be an 21 encouragement for them to participate. 22 Q. (BY MR. BOLTON) Including his participation in 23 the Cannon office building? 24 A. That's what I'm talking about. 25 MR. THERIOT: Whenever you're ready, it's</p>

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1 12:30.  
 2 MR. BOLTON: Is now a good time to take a  
 3 break then?  
 4 MR. THERIOT: Sure.  
 5 MR. BOLTON: And then I'll organize. We won't  
 6 be a whole lot longer.  
 7 MR. THERIOT: Okay. Great.  
 8 (A lunch break was taken from 12:27 p.m. until  
 9 1:12 p.m.)  
 10 Q. (BY MR. BOLTON) Mrs. Dobson, my understanding  
 11 is that, at least in the last few years, most of the  
 12 governors are incorporating the task force theme and  
 13 supporting scripture in their own proclamations. Do  
 14 you have any explanation for why that is?  
 15 MR. THERIOT: Objection, assumes facts not  
 16 established.  
 17 A. I don't know why they would include it. I  
 18 don't know.  
 19 Q. (BY MR. BOLTON) Who is the intended audience  
 20 of these various proclamations?  
 21 A. To the people of the state.  
 22 Q. Or in the case of the President?  
 23 A. The people of the nation.  
 24 Q. The annual theme and supporting scripture that  
 25 you utilized this year, is there any effort made by the

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1 task force to conceal its Judeo-Christian  
 2 orientation?  
 3 A. No.  
 4 Q. In other words, at least to you, the annual  
 5 theme and supporting scripture would be readily  
 6 recognized, at least by your constituency, as coming  
 7 from that Judeo-Christian background?  
 8 A. Yes.  
 9 (Exhibit 12 was marked for identification.)  
 10 Q. (BY MR. BOLTON) Mrs. Dobson, we marked and I  
 11 presented to you Exhibit 12, and that's the letter that  
 12 you wrote to President Bush in anticipation of the 2008  
 13 National Day of Prayer; is that correct?  
 14 A. Yes.  
 15 Q. And, again, in the third paragraph, it  
 16 indicates that you provided the President with a draft  
 17 of a proclamation, correct?  
 18 A. Yes.  
 19 Q. And then it goes on to say, in the same  
 20 paragraph, the third paragraph of Exhibit 12, that you  
 21 state that your 40,000 volunteer coordinators will be  
 22 reading the proclamation at their events, and that the  
 23 President's declaration underscoring the need for  
 24 corporate and personal intercession will lend  
 25 tremendous prestige and credibility to these

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1 gatherings. And then you go on to say, "In addition,  
 2 we plan to release it to the media the week preceding  
 3 May 1st."  
 4 First of all, you make reference to 40,000  
 5 volunteer coordinators. To the best of your knowledge,  
 6 that was an accurate number at least at the time of  
 7 this letter?  
 8 A. Yes.  
 9 Q. And you indicate that those coordinators will  
 10 be reading the President's proclamation underscoring  
 11 the need for corporate and personal intercession. And  
 12 my understanding from when we talked this morning, that  
 13 means underscoring the need for group and personal  
 14 prayer basically?  
 15 A. Correct.  
 16 (Exhibit 13 was marked for identification.)  
 17 Q. (BY MR. BOLTON) Exhibit 13 is an earlier  
 18 letter. Again, it looks to me like it's a form, the  
 19 template that you used to write to the governors in  
 20 2006 in anticipation of that year's National Day of  
 21 Prayer, correct?  
 22 A. Correct.  
 23 Q. And this is a letter that you would have sent  
 24 to each of the governors, correct?  
 25 A. That's right.

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1 Q. In the second paragraph, you state that you  
 2 are convinced that the theme for this year, the 2006  
 3 observance, and the theme was America Honor God, "will  
 4 serve as a valuable reminder that the Lord is at work  
 5 in this great land and is deserving of veneration and  
 6 absolute trust." Do you think that that message is  
 7 somehow conveyed by the theme itself?  
 8 A. Well, when I say that it will serve as a  
 9 valuable reminder, I'm not saying that to the governor.  
 10 I'm saying that it will serve as a valuable reminder to  
 11 the nation that the Lord is at work in our great  
 12 land.  
 13 Q. Okay. The theme does?  
 14 A. Yes.  
 15 Q. Later in that same paragraph, the second  
 16 paragraph of Exhibit 13, you write to the different  
 17 governors that with their support, "We can further our  
 18 efforts to call the nation to prayer, acknowledging our  
 19 Creator, and asking for guidance and protection on  
 20 behalf of our families, our government, and our Armed  
 21 Forces." Do you see that language?  
 22 A. I do.  
 23 Q. And when you say that with the governor's  
 24 support "we can further that effort," the support that  
 25 you're asking for there is in the form of signing and

35 (Pages 134 to 137)

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1 issuing a proclamation. Am I reading that correctly?

2 A. That's right.

3 Q. And then when you say with that support, "we  
4 can further our efforts," now, the "we" there, is that  
5 a corporate we, is that a task force we, or is that a  
6 broader we, meaning the task force and your  
7 constituency as well as the government leaders that  
8 you're writing to?

9 A. I would say the task force at the grass-roots  
10 level, the people at the grass-roots -- the National  
11 Day of Prayer is really a grass-roots level, they're

12 the ones that do all the work out there. They put the  
13 events together. And so that is what is meant by that,  
14 our task force as well as those that work at the  
15 grass-roots level.

16 Q. Were you involved in any sort of planning or  
17 conceptualizing on how the task force could turn the  
18 National Day of Prayer into a call to the nation to  
19 embrace prayer? Was that something that you undertook,  
20 as a task force, to try and turn the National Day of  
21 Prayer into, or was it something that was already there  
22 that you took advantage of?

23 MR. ROSENBERG: Objection as to form.

24 A. Mrs. Vonette Bright was the chairman for eight  
25 years before me, and things were already, you know --

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1 in other words, I just took over the baton from her,  
2 and the groundwork was already laid pretty much by her,  
3 and I just built on it.

4 Q. (BY MR. BOLTON) Did you understand that you  
5 were trying to -- I mean, you're saying Mrs. Bright had  
6 been the chairman I think you said?

7 A. For eight years.

8 Q. And I'm not sure of the math there. My  
9 understanding is that the task force was created in  
10 1988 and that you became a cochair in 1989.

11 A. All I know is that Vonette told me that she  
12 had been chair for eight years.

13 Q. Who is Mrs. Bright? I confess that I don't  
14 know her background or the name.

15 A. Well, they have a ministry, and she's the  
16 cofounder with her husband, Dr. Bill Bright. They have  
17 a ministry called Campus Crusade for Christ, and it's a  
18 campus ministry at universities, Bible studies and  
19 support groups, and she's also a member of the National  
20 Prayer Committee, and she was also at the Lausanne  
21 Covenant meeting.

22 Q. Do you understand that by this point in time,  
23 the National Day of Prayer has become a call to the  
24 nation to prayer?

25 MR. THERIOT: Objection, vague.

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1 MR. ROSENBERG: Objection.

2 MR. THERIOT: Are you talking about now or the  
3 date of the exhibit?

4 MR. BOLTON: Now.

5 A. Can you repeat the question?

6 MR. BOLTON: Can you read it back?

7 (The requested question was read back by the  
8 reporter.)

9 MR. ROSENBERG: And I just want to object both  
10 on form and assumes facts not in evidence.

11 MR. BOLTON: I have actually never known that  
12 to be a deposition objection.

13 Q. (BY MR. BOLTON) Can you answer the question?

14 A. National Day of Prayer is put -- is on many of  
15 our calendars in America, and so it is known as a day,  
16 you know, for people to come together to pray or to  
17 pray in their homes, wherever they are, in their car  
18 with a cup of coffee going to work, but it is a day to  
19 remember our nation, our families, our military in  
20 corporate prayer and individual prayer.

21 Q. What would be lost, in your view, if the  
22 National Day of Prayer was simply a designated day but  
23 it was not an occasion for corporate prayer but merely  
24 personal prayer and reflection?

25 A. I think we would lose a great blessing on our

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1 land. I think it's wonderful to have a day to remind  
2 people the need to pray for America, for those that  
3 lead us to ask for God's continued blessing and  
4 protection on our land and to ask for wisdom and  
5 guidance for those that lead us.

6 Q. Now, the National Day of Prayer Task Force has  
7 become the subject of some criticism by some groups  
8 that are not your constituency. Is that true?

9 A. Yes.

10 Q. And the criticism is that -- and you may have  
11 seen this term used -- the National Day of Prayer has  
12 been hijacked by groups like your own. Have you seen  
13 or heard of that, that particular phrasing?

14 A. Yes, I've seen it in the newspaper.

15 Q. In terms of the appearance of the National Day  
16 of Prayer as a Judeo-Christian celebration, can you  
17 understand why that would be divisive to groups that  
18 don't share your views?

19 MR. THERIOT: Objection, calls for  
20 speculation.

21 A. I think National Day of Prayer is probably  
22 the -- National Day of Prayer Task Force expression of  
23 the National Day of Prayer is probably the best  
24 organized and the largest, and, therefore, that's how  
25 we're seen. But, as I said before, any faith can have



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1 their own task force, can celebrate the National Day of  
2 Prayer, and can grow their movement just like we  
3 have.

4 Q. (BY MR. BOLTON) And for those that are upset,  
5 they should simply do a better job of organizing, is  
6 that really the response that you would make to them?

7 A. I would just remind them that this day belongs  
8 to all Americans and we are a privately owned and  
9 funded 501(c)(3), and, therefore, we can express it  
10 however we decide to.

11 Q. But there is a sense in which the official  
12 celebrations and observances of the day of prayer have  
13 become -- have a distinct Christian flavor.

14 MR. THERIOT: Objection, assumes facts not in  
15 evidence -- or not established is the proper  
16 objection.

17 MR. BOLTON: I'm not actually sure that I have  
18 to prove anything in a deposition. Can you read the  
19 question back to the witness?

20 (The requested question was read back by the  
21 reporter.)

22 MR. THERIOT: Same objection.

23 A. Some would see it that way.

24 Q. (BY MR. BOLTON) And at least for those that  
25 see it that way and may not be of a Judeo-Christian

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1 orientation, can you understand then, whether correctly  
2 or not, why they would be upset about how the National  
3 Day of Prayer is being celebrated?

4 MR. THERIOT: Objection, calls for  
5 speculation.

6 A. I don't know how they would see it.

7 Q. (BY MR. BOLTON) Pardon?

8 A. I don't know how they would see it.

9 Q. You're certainly aware, though, of the  
10 controversy and the use of the word "hijacking" in  
11 terms of the day of prayer, correct?

12 A. When I have seen that in the newspaper, it has  
13 usually been a quote by Barry Lynn.

14 Q. I know Mr. Lynn.

15 A. So I see it in that context. I think he was  
16 the first one that used that.

17 Q. Have you heard of the group Jews on First?

18 A. Yes.

19 Q. I think they may actually have been the ones  
20 that used the hijacking language first.

21 A. Well, I've seen it in the paper as quoted by  
22 Barry Lynn, but you could be right.

23 Q. But in any event, what do you think causes  
24 this reaction against the National Day of Prayer as  
25 it's been celebrated?

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1 MR. THERIOT: Objection, speculation.

2 A. I see it as harassment.

3 Q. (BY MR. BOLTON) Pardon?

4 A. I see it as harassment.

5 Q. So these organizations and groups that have a  
6 problem are harassing groups like your own?

7 A. In the way they speak, I think it's  
8 harassment. None of them offer a solution or an option  
9 to the National Day of Prayer. I mean, they just  
10 object to it.

11 Q. And as you understand the day of prayer then,  
12 I mean, you may be better organized than other groups,  
13 but that that opportunity is available to any group  
14 that wants to celebrate and promote prayer?

15 A. Absolutely.

16 Q. What about people who are nonbelievers?

17 A. Well, there was a group in Oklahoma that I  
18 think it was Atheists Against the National Day of  
19 Prayer, so they had a celebration on the National Day  
20 of Prayer. So anyone can do whatever they want. We're  
21 just expressing it from our constituent base and what  
22 we believe.

23 Q. But you could have a celebration promoting  
24 prayer without there being a National Day of Prayer,  
25 correct?

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1 A. Yes.

2 Q. In which case you would be in the same boat as  
3 the Atheist group in Oklahoma, correct?

4 MR. THERIOT: Objection, vague.

5 A. No.

6 Q. (BY MR. BOLTON) I mean, there is a distinction  
7 between having your own celebration without a  
8 presidential endorsement and having your observances  
9 with a presidential endorsement?

10 MR. THERIOT: Objection, assumes facts not  
11 established. Presidential endorsement -- "endorsement"  
12 is a legal term of art. There's been no concession  
13 that the President has endorsed the National Day of  
14 Prayer.

15 MR. BOLTON: I understand the objection,  
16 failure to prove a fact. It's a deposition that we're  
17 conducting.

18 MR. THERIOT: I understand, but you're  
19 assuming facts that haven't been established. You're  
20 assuming, for instance, that the National Day of Prayer  
21 endorses prayer. That's a legal term of art. I'm not  
22 going to let that go without objecting, but she can  
23 answer to the extent that she knows.

24 A. Could you restate the question?

25 (The requested question was read back by the

37 (Pages 142 to 145)

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1 reporter.)

2 A. Well, as my lawyer said, the President doesn't  
3 endorse the National Day of Prayer. He may support it,  
4 but officially he doesn't endorse it. We encourage  
5 prayer 365 days of the year, not just on the National  
6 Day of Prayer. That is just a rallying -- sort of a  
7 rallying day that is targeted to praying more for our  
8 government and its leaders, for our military, and for  
9 the people of this country. Did I answer your  
10 question?

11 Q. (BY MR. BOLTON) Well, it still seems to me  
12 that the National Day of Prayer is a hard one -- I  
13 mean, you say that it's certainly recognizable for  
14 whatever religion you may believe in, but it still  
15 seems like it's a hard sell for an unbeliever, that  
16 somehow this day has something for them.

17 MR. ROSENBERG: Objection.

18 MR. THERIOT: Objection. It's not in the form  
19 of a question.

20 Q. (BY MR. BOLTON) Would you agree that that  
21 sounds like kind of a hard sell?

22 A. I'm not clear on the question. Maybe I'm  
23 getting tired.

24 Q. Certainly the National Day of Prayer is not  
25 intended to -- I mean, it is intended to acknowledge

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1 religion, you would agree with that much at least,  
2 right?

3 A. The National Day of Prayer is set aside for  
4 people to pray, and they cannot pray or they can pray.  
5 It's totally up to them. It's a day that's been given  
6 to us by our Congress. It's a day we can celebrate it  
7 or not celebrate it. There are millions of people that  
8 don't celebrate the National Day of Prayer. They don't  
9 pray on that day or maybe any other day. I don't know.

10 (Exhibit 14 was marked for identification.)

11 Q. (BY MR. BOLTON) Exhibit 14 is a letter that  
12 you wrote to Secretary of Education Paige back in 2004;  
13 is that correct?

14 A. Correct.

15 Q. And he represented the executive branch in the  
16 '04 Cannon office building observance; is that  
17 correct?

18 A. That's correct.

19 Q. And in the second paragraph, you state that,  
20 "Foundational to our country has been the understanding  
21 that God," God with a capital G, "is the Source," and  
22 source also with a capital letter, "of freedom and has  
23 given His creation," His capitalized, "inalienable  
24 rights." The foundational God that you're talking  
25 about is the God of your Bible, correct?

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1 A. God of the Bible, yes. Creator God.

2 Q. And the theme that you selected for '04 is  
3 based on supporting scripture in Leviticus, correct?

4 A. Correct.

5 Q. And it was your hope, as you expressed it to  
6 Secretary Paige, that the message that God is the  
7 Source of freedom and has given His creation  
8 inalienable rights, that this message would be a  
9 catalyst to draw Americans closer to God as they look  
10 to Him for guidance with their personal concerns as  
11 well as those of our leaders, community and country.

12 You wrote that, correct?

13 A. I wrote it along with Master Writers,  
14 correct.

15 Q. Does it reflect more your views or Master  
16 Writers' views?

17 A. I think in that particular sentence -- or  
18 paragraph, I think it would probably be Master Writers  
19 helped craft the way it was worded. Of course, I  
20 always read the letters and I approve them.

21 Q. Pardon?

22 A. I always read the letters and approve them. I  
23 don't let them go out over my signature without reading  
24 them.

25 Q. The letter that you signed indicates that you

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1 hope that the theme for '04 will be a catalyst to draw  
2 Americans closer to God. Do you disagree with that?

3 A. No, I agree with that.

4 Q. And then you ask that the Secretary Paige  
5 present a brief message calling for prayer on behalf of  
6 those in the executive branch of government. And did  
7 you mean that?

8 A. Yes.

9 Q. And, in fact, the purpose, as you've expressed  
10 it, of this Cannon office building observance is to  
11 call for prayer, correct?

12 A. Correct.

13 (Exhibit 15 was marked for identification.)

14 Q. (BY MR. BOLTON) Exhibit 15, have you had a  
15 chance to look at it?

16 A. Yes.

17 Q. And was that your invitation to the East Room?  
18 Or this was the Rose Garden observance of the National  
19 Day of Prayer in '08, correct?

20 A. No. I believe this was in the East Room.

21 Q. Okay.

22 A. No. It says the Rose Garden. Do you know  
23 what, it was supposed to be the Rose Garden and then  
24 the White House changed it at the last minute and we  
25 were in the East Room.

38 (Pages 146 to 149)

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1 Q. And Exhibit 15, that was the invitation that  
2 you received?

3 A. The public liaison's office sends out  
4 invitations. So, yes, this is one that we sent to some  
5 of our constituents. They allow us to choose 100  
6 people, and then they choose their list, which is  
7 usually 250, to attend that.

8 Q. So at this East Room observance then, how many  
9 people would there be?

10 A. I would say around 230, 250 people.

11 Q. And the task force, you would be allowed to  
12 extend some of the invitations then?

13 A. No. We were allowed to present some names of  
14 people that we would like to be invited. Some were and  
15 some weren't. It all depends on the White House.

16 Q. And do you know what criteria was used to  
17 select who would attend the White House observance of  
18 the day of prayer?

19 A. The First Lady wanted all dimensions of our  
20 culture represented there. She wanted Hispanic, black,  
21 Caucasian, she wanted people with different religions,  
22 she wanted kind of a -- how can I put it? Kind of a  
23 spattering of our culture, just different religions,  
24 different races, poor, wealthy.

25 Q. Do you know whether any nonbelievers were

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1 invited?

2 A. I don't know.

3 Q. Would you expect that nonbelievers would be  
4 invited to this observance?

5 A. I don't know. I certainly don't know  
6 everybody who believes and doesn't believe, and I doubt  
7 that the First Lady knew either.

8 Q. In terms of that East Room observance, about  
9 how long would that observance --

10 A. Usually 30 minutes.

11 Q. And how was it conducted? What happened?

12 A. Well, it was a prayer service, and so we would  
13 be led into the East Room and the President would come  
14 in later to be seated, and then the prayer service  
15 started, and that was conducted by the public liaison's  
16 office. It had music, and they had prayers by  
17 different religious people, and then the President  
18 would close by having a short speech.

19 Q. And certainly this observance, then, was  
20 referenced as the designated National Day of Prayer,  
21 correct?

22 A. Right.

23 Q. And that was the reason for the occasion,  
24 correct?

25 A. Yes. They were celebrating -- that was their

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1 way of celebrating the National Day of Prayer.

2 (Exhibit 16 was marked for identification.)

3 Q. (BY MR. BOLTON) Now, I think I presented  
4 Exhibit 16, but correct me, does it have a blue sticker  
5 on it that says Exhibit 16?

6 A. Yes.

7 Q. Can you identify Exhibit 16?

8 A. Yes. It's our National Day of Prayer Task  
9 Force poster.

10 Q. And this was something prepared by the task  
11 force?

12 A. Actually, I misspoke before. Focus on the  
13 Family has an art department. I think I said that  
14 we're charged for the services that they give us, and  
15 so the art department gave us -- gives us three or four  
16 options for our logo and also for our posters, and then  
17 we select the one that we like.

18 Q. Okay. So Exhibit 16 was prepared for the task  
19 force though, correct?

20 A. Yes.

21 Q. How was this poster distributed? Where did  
22 you put it?

23 A. Well, people -- we put it in our catalog, and  
24 people order it if they want it. Sometimes it's put in  
25 businesses, churches. We don't even know where it ends

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1 up, but people just order it.

2 Q. But this is a poster that is -- I mean, is it  
3 basically a commemorative then, or is it used also  
4 for --

5 A. We have a different poster every year that  
6 goes with the theme.

7 Q. And at the very top it says, "58th Annual  
8 Observance," then right below that in large lettering  
9 it says, "Prayer, America's Hope," and Prayer,  
10 America's Hope, was your '09 theme?

11 A. Yes.

12 Q. Was this poster used for any purpose, you  
13 know, any sort of, you know, promotional purpose in  
14 terms of alerting people of the observance, or is this  
15 basically just a poster that is created for people who  
16 want to buy it from your catalog and then do whatever  
17 they want with it?

18 A. That's correct.

19 Q. The latter?

20 A. The latter, yes.

21 Q. So it's really a commemorative type of poster  
22 then?

23 A. Right.

24 Q. Okay. It says "58th Annual Observance," and  
25 then immediately below it there's a reference in large

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<p>1 letters to the task force's annual theme. Certainly</p> <p>2 the 58th Annual Observance is not referencing anything</p> <p>3 to do with the task force itself, correct?</p> <p>4 A. No. I mean, yes, you're correct about that.</p> <p>5 Q. Pardon?</p> <p>6 A. You're correct.</p> <p>7 Q. And then down at the bottom it says, "National</p> <p>8 Day of Prayer" and it gives the date and it references</p> <p>9 the Cannon House Office Building, Caucus Room. With</p> <p>10 this particular commemorative, is there any cue to</p> <p>11 people who look at this that this is actually a task</p>	<p>1 A. Yes.</p> <p>2 Q. What is it?</p> <p>3 A. It is the program. It's what people are given</p> <p>4 when they come into the National Day of Prayer</p> <p>5 observance. They're given a program.</p> <p>6 Q. Okay. And would this program have been</p> <p>7 prepared by or for the task force?</p> <p>8 A. No. We prepare this.</p> <p>9 Q. So this would have been something that was</p> <p>10 prepared by the task force itself?</p> <p>11 A. Yes.</p>
<p>12 force observance?</p> <p>13 A. Most of the people that join us for the</p> <p>14 National Day of Prayer in Washington, D.C. I would say</p> <p>15 are constituents that know about the task force. So</p> <p>16 I'm sure they would know.</p> <p>17 Q. But to people that weren't involved in these</p> <p>18 actual observances -- you say the people who actually</p> <p>19 participate in the observances would know?</p> <p>20 A. Uh-huh.</p> <p>21 Q. If I was not a participant in the observance</p> <p>22 in the Cannon office building, is there anything in</p> <p>23 Exhibit 16 that would readily alert me that this is a</p> <p>24 task force presentation?</p> <p>25 A. I don't know how people would see this. I</p>	<p>12 Q. And this is the program for the '09 Cannon</p> <p>13 office building observance, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And it says at the top, it says, "National Day</p> <p>16 of Prayer, Cannon Program." It gives an address. And</p> <p>17 then it says 9 a.m. to 12 p.m. It is a three-hour</p> <p>18 program?</p> <p>19 A. Yes.</p> <p>20 Q. And about how many attendees are there for the</p> <p>21 Cannon program?</p> <p>22 A. I think the building holds about 350.</p> <p>23 Q. And then that guest list, that's one that the</p> <p>24 task force controls?</p> <p>25 A. We invite some people, but it's open to the</p>
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<p>1 can't speculate on what you would think or what other</p> <p>2 people would think.</p> <p>3 Q. Can we agree, without speculation, that there</p> <p>4 is nothing on here that makes reference to the task</p> <p>5 force?</p> <p>6 A. Correct.</p> <p>7 Q. Okay.</p> <p>8 A. Can I ask you a question?</p> <p>9 Q. Yes.</p> <p>10 A. Where did you get this? What did this come</p> <p>11 off of?</p> <p>12 Q. I don't know.</p> <p>13 A. Because it's possible that it did have our</p> <p>14 logo down here saying "task force." It's possible,</p> <p>15 because we usually don't do a poster without a logo on</p> <p>16 it.</p> <p>17 Q. It has the Bates numbers from your lawyer, so</p> <p>18 it would have come from --</p> <p>19 MR. THERIOT: Yeah, we provided that to them.</p> <p>20 The original, you're right, might have something that's</p> <p>21 a little clearer.</p> <p>22 A. We usually all put our logo on this that says</p> <p>23 "task force."</p> <p>24 (Exhibit 17 was marked for identification.)</p> <p>25 Q. (BY MR. BOLTON) Can you identify Exhibit 17?</p>	<p>1 public. We have people coming from all over the</p> <p>2 nation.</p> <p>3 Q. So in terms of the number of invites that the</p> <p>4 task force sends out, of that 250 people, about how</p> <p>5 many of those would be at the invitation of the task</p> <p>6 force?</p> <p>7 A. Our public affairs person would have the</p> <p>8 answer to that.</p> <p>9 Q. Okay. Do you have any understanding or</p> <p>10 estimate of how much of that audience is task force</p> <p>11 invited?</p> <p>12 A. It varies from year to year. You would have</p> <p>13 to ask Faye Tharp. She's our public affairs</p> <p>14 director.</p> <p>15 Q. Now, when people come to the Cannon program</p> <p>16 are they given this program?</p> <p>17 A. Yes.</p> <p>18 Q. Are they given anything else? Do they get any</p> <p>19 other written materials?</p> <p>20 A. I think, on occasion, we've given out our</p> <p>21 bookmarks which gives the prayer for the 7 times 7, the</p> <p>22 government, military, media, education, church and</p> <p>23 family.</p> <p>24 Q. You said it's open to the public. And</p> <p>25 presumably the people that are the guests of the task</p>



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<p>1 force, I assume they have some sort of reserved 2 seating. 3 A. We have a few reserved seats up front, and we 4 also reserve a section for the congressmen and senators 5 that might drop in so they will always be able to find 6 a seat. We save a couple of rows for them. 7 Q. For those people that are not guests, invited 8 guests of the task force, but are members of the 9 public, how are they made aware? How is this Cannon 10 office National Day of Prayer observance advertised? 11 A. Well, we do radio spots, and we announce that</p>	<p>1 18 looks like -- you made reference that Exhibit 17 was 2 an inside page of the Cannon Caucus Room Observance 3 from '09 and that it was part of a larger program. Is 4 Exhibit 18 the entire program? 5 A. Yes, I believe it is. 6 Q. The first page, at least as we looked at it, 7 doesn't necessarily -- I didn't see any reference to 8 the task force on the first page or the second page. 9 Am I correct? 10 A. This is a program that's a bifold. All the 11 information is on it, front, inside and back. It's all</p>
<p>12 we're going to be having a Washington, D.C. service at 13 the Cannon House office building, and we put a little 14 reminder in roll call that goes in Congress. You know, 15 you can do that, just announcing that there will be a 16 service in the Cannon office building, and probably in 17 some of our literature that we send out. 18 Q. In terms of Exhibit 17, in its own right, is 19 there an indication on Exhibit 17 that this is an 20 observance that is sponsored by the National Day of 21 Prayer Task Force? 22 A. Not on this particular program. 23 Q. To your knowledge, is that typical or 24 atypical? 25 A. This is the inside of the program. The</p>	<p>12 one piece. 13 Q. At least as it's been reproduced here, the 14 third page, though, does show basically the task 15 force -- basically your employees -- and I don't have a 16 copy in front of me, but certainly many references to 17 the task force, correct? 18 A. Yes. 19 Q. So there's certainly nothing then about 20 Exhibit 18 that would indicate that this is a 21 nondenominational observance, correct? I mean, the 22 Cannon office building observance is -- I mean, it's a 23 task force presentation, correct? 24 A. Other faiths are not included, but the program 25 is a Judeo-Christian expression of the National Day of</p>
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<p>1 outside of the program could have the logo saying "task 2 force." Do you have a copy of that? 3 Q. I don't know. 4 A. I can get a copy. 5 Q. Certainly on Exhibit 17 itself, it is 6 identified as the Cannon Caucus Room Observance, 7 correct? 8 A. Yes. But if you look down at the keynote 9 speaker, it says, "Mrs. Beth Moore, Honorary Chairman, 10 National Day of Prayer Task Force." 11 Q. Well, it also says, "Prayer for the Nations, 12 Ambassador to the United States," and I'm assuming that 13 the indication of any of these other people does not 14 actually identify the sponsor of this observance, 15 correct? 16 A. Well, down below it says, "Prayer Challenge, 17 Mr. Brian Toon, Vice Chairman, National Day of Prayer 18 Task Force." 19 MR. THERIOT: Rich, I was just provided a 20 document that appears to be the whole document. If you 21 want to, you can refer to that. 22 MR. BOLTON: Can we mark this? 23 MR. ROSENBERG: Yeah. 24 (Exhibit 18 was marked for identification.) 25 Q. (BY MR. BOLTON) What we've marked as Exhibit</p>	<p>1 Prayer, our task force expression. 2 Q. And certainly in '09, that's what it was, 3 correct? 4 A. Yes. 5 Q. And that's been the tenor of the observance in 6 the Cannon office building since you've been the 7 chairman of the task force, correct? 8 A. Since Vonette Bright has been the chairman. 9 Q. You became the cochair in 1989. And as I 10 understand it, the task force was created in '88. Do 11 you know whether the task force was created before or 12 after the National Day of Prayer was celebrated in 13 1988? 14 A. Vonette Bright would know the answer to that. 15 I'm not sure on that. 16 Q. Certainly, you've been involved pretty much 17 then, if not for the entire -- all of the observances 18 in the Cannon office building, certainly all of them 19 except one, correct? 20 A. I don't know how many previous services were 21 in the Cannon House office building, but I have 22 attended and helped with the program since 1991 when 23 I became chairman. 24 Q. And then do you attend as well, then, all of 25 the -- I mean, in the last few years, you had attended</p>

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1 the White House observance, and then would you go from  
2 the White House observance to the Cannon office  
3 building observance?

4 A. Yes, because that's our national observance,  
5 so I would be there.

6 Q. Reverend Claude Pike, is that a name that  
7 you're familiar with?

8 A. No.

9 Q. My understanding is that in 1982, he was  
10 trying to encourage President Reagan to make a bigger  
11 thing of the National Day of Prayer and that Ronald

12 Reagan gathered religious leaders in 1982 to witness  
13 his signing of the National Day of Prayer proclamation  
14 that year. Were you or your husband invited to that?

15 A. I was invited.

16 Q. Okay. Do you recall it?

17 A. Yes.

18 Q. Did you attend?

19 A. No.

20 Q. Were you simply not able to attend, or was  
21 there any -- did you have any objection to attending?

22 A. I don't remember what the circumstances were,  
23 but I didn't attend it, and I think it was my choice,  
24 but I'm sorry now that I didn't because it was a very  
25 important thing in our nation, and I wish I would have

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1 been there.

2 Q. It was a very important what?

3 A. I think it was a very important document that  
4 was signed for our nation, and I wish I had been  
5 there.

6 Q. And just so we're clear, what did you  
7 understand that you were invited to watch President  
8 Reagan sign in 1982?

9 A. I heard that he was going to sign into law  
10 that the first Thursday of May was going to be our  
11 national day of prayer.

12 Q. And just so we're clear, I was referring to a  
13 different -- that was in 1988. My understanding was  
14 that President Reagan gathered some religious leaders  
15 to witness his signing, just his signing of the 1982  
16 National Day of Prayer proclamation. So we're talking  
17 about different things. And just so we're clear, that  
18 1982 signing of the proclamation was not what you were  
19 referring to that you were invited to?

20 A. No. I was referring to the signing into law  
21 the first Thursday of May.

22 Q. And in terms of the 1988 signing into law that  
23 mandated the first Thursday in May of each year to be  
24 designated the day of prayer, why do you believe that  
25 that was an important occasion?

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1 A. Well, I think any time a president signs into  
2 law some type of bill, I think it's an honor to be  
3 there. And since I am a product of prayer as a small  
4 child and have grown up believing in the power of  
5 prayer, and to have a president sign into law the first  
6 Thursday of May, that's a very big thing to me.

7 Q. Did it give it more meaning than the  
8 legislation that was signed by President Truman in  
9 1952?

10 A. I think so. I think people of faith wanted to  
11 have a day that they could know was going to be a day  
12 of prayer instead of just letting it be at the whim of  
13 the President.

14 Q. Certainly calendar makers would agree with  
15 that?

16 A. Yes. Hallmark liked it.

17 Q. Pardon?

18 A. Hallmark liked it.

19 Q. And, certainly, your staff would agree with  
20 that; it's a lot easier to organize around a date  
21 certain, correct?

22 A. Yes.

23 Q. Susan Turner, is that a name you're familiar  
24 with?

25 A. Yes.

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1 Q. And who is Susan Turner?

2 A. She's a volunteer. She comes and helps at our  
3 office in many ways, and she provides scholarship money  
4 for when we have a prayer coleader's conference or a  
5 prayer summit and people want to come but can't afford  
6 to come, she provides assistance for them.

7 Q. Was she involved in the National Day of Prayer  
8 coordinators' school event? There's a document that  
9 I've seen called the NDP Coordinators' School Prayer  
10 Event.

11 A. That's misnamed. We have a prayer summit in  
12 October which used to be called coordinators'  
13 conference, and that's where we bring our coordinators  
14 from around the nation here for a prayer service.

15 Q. In terms of the constituencies that the task  
16 force has come to mobilize, you've got a lot of  
17 different groups with people targeting different  
18 groups. Are schools in the observance of the National  
19 Day of Prayer a targeted group?

20 A. Not really. If any school does anything on  
21 the National Day of Prayer, it's usually student led  
22 and it is within the parameter of what is  
23 appropriate.

24 Q. Is there anybody who has sort of designated  
25 responsibility for mobilizing schools and school-aged

42 (Pages 162 to 165)

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1 kids?

2 A. No.

3 Q. The National Day of Prayer, on its Website,  
4 indicates that its goal is to provide collective  
5 servant leadership to the national prayer movement.  
6 National prayer movement, is that a term of art that is  
7 identified with anything in particular?

8 A. The National Prayer Committee is made up of  
9 leaders of prayer ministries all across the nation. So  
10 I think he was using a broad term there.

11 MR. BOLTON: I'm almost done. Why don't we  
12 take about a five-minute break just for me to look  
13 through my notes, and then I'll at least be done.

14 THE WITNESS: Okay.

15 MR. BOLTON: Thank you.

16 (A brief break was taken.)

17 (Exhibit 19 was marked for identification.)

18 Q. (BY MR. BOLTON) Mrs. Dobson, I've handed you  
19 what I've marked as Exhibit 19. Can you identify that  
20 document?

21 A. Let me look at this.

22 Q. While you're looking, I will tell you that  
23 when I looked at it, it looked like it was directed to  
24 coordinators of National Day of Prayer observances at  
25 the school level.

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1 A. It looked like Susan Taylor put this  
2 together -- or Turner, I'm sorry. What was your  
3 question?

4 Q. Well, first of all, have you seen that  
5 document before?

6 A. I have not.

7 Q. I mean, do you have any reason to believe that  
8 that's not a National Day of Prayer Task Force  
9 document?

10 A. No, I believe it is a National Day of Prayer  
11 Coordinators' School Prayer Event Guide as it says. I  
12 just have not seen it.

13 Q. Does it refresh your recollection, then, as to  
14 coordinating activities directed toward observances at  
15 the school level?

16 A. Susan Turner put this together for our state  
17 coordinators, I believe, and what is allowed and what  
18 is not allowed in schools for prayer on the National  
19 Day of Prayer or prayer any time. There are certain  
20 restrictions.

21 Q. And Susan Taylor apparently put this together,  
22 correct?

23 A. Turner, yes.

24 Q. Does she have any background, or why would  
25 this be something that she would have done?

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1 A. Susan has a real heart for children, and she's  
2 a real -- what I would call a prayer warrior, and  
3 there's so much violence and corruptness in our schools  
4 that, I think, she really felt it would be a good thing  
5 if students that wanted to pray had a place and a time  
6 to pray on the National Day of Prayer. It could be on  
7 the 50-yard line, it could be around their flagpole in  
8 the morning. They have this prayer day, I believe it's  
9 in September, See You at the Pole, where students  
10 gather around the flagpoles for prayer, and we don't  
11 have anything to do with that. That's something  
12 else.

13 Q. When you say she's a "prayer warrior," it's  
14 interesting, because when I read through the guide that  
15 she put together there, there seems to be a lot of  
16 pushback to something that happened in 1962, what she  
17 construed to be the Supreme Court's decision that said  
18 that religion had to be banished from the schools. Is  
19 that something that you know her to be quite concerned  
20 about?

21 A. I have not talked to her about it. I don't  
22 know if she's concerned about it.

23 Q. Certainly Exhibit 19, though, is an official  
24 task force document. Are there views in there that are  
25 expressed that you disagree with that you've had a

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1 chance to see? And I recognize you've only glanced at  
2 it.

3 A. I have not read it, but I would assume that  
4 our executive director has read it and okayed it.

5 Q. Okay. With regard to the formation of the  
6 task force by the National Prayer Committee, are  
7 there -- first of all, the National Prayer Committee, I  
8 assume, is a wholly transparent organization? I mean,  
9 its membership is public, correct?

10 A. On the back of our letterhead, it has all the  
11 names.

12 Q. And since I don't know anybody, I wouldn't  
13 recognize names that I should recognize. Were there  
14 any government officials on the National Prayer  
15 Committee, to your knowledge --

16 A. No.

17 Q. -- at the time of the formation of the task  
18 force?

19 A. No.

20 Q. I think I asked whether or not you had had  
21 occasion to talk with President Bush about the National  
22 Day of Prayer, and I believe your answer was that you  
23 had not.

24 A. Correct.

25 Q. Do you know whether other task force staff or

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<p>1 employees had any direct communication with the White</p> <p>2 House regarding the National Day of Prayer?</p> <p>3 A. With the White House or with the President?</p> <p>4 Q. The President or his -- with the White House.</p> <p>5 A. No one has ever had a conversation with the</p> <p>6 President. The only one that we have spoken to at the</p> <p>7 White House was the public liaison who is in charge, I</p> <p>8 guess, of the program and whether they have a prayer</p> <p>9 service or not.</p> <p>10 Q. Have you or your husband ever stayed at the</p> <p>11 White House in regards to the National Day of Prayer?</p>	<p>1 A. That's right.</p> <p>2 MR. THERIOT: I believe that's all I have.</p> <p>3 MR. ROSENBERG: I actually have a few</p> <p>4 questions.</p> <p>5 EXAMINATION</p> <p>6 BY MR. ROSENBERG:</p> <p>7 Q. Good afternoon, Mrs. Dobson.</p> <p>8 A. Good afternoon.</p> <p>9 Q. My name is Brad Rosenberg. I'm a trial</p> <p>10 attorney in the civil division of the United States</p> <p>11 Department of Justice. And as we discussed a little</p>
<p>12 A. It would be nice, but no. No.</p> <p>13 Q. Have you been to the White House for any</p> <p>14 nonNational Day of Prayer functions?</p> <p>15 A. Yes.</p> <p>16 Q. And on how many occasions?</p> <p>17 A. When I have attended, it has always been with</p> <p>18 my husband, and it's usually been some religious</p> <p>19 leadership meeting that the President wanted to have or</p> <p>20 a signing of a bill about abortion, we were invited for</p> <p>21 that, along with -- not privately, but along with like</p> <p>22 200 people.</p> <p>23 Q. And how many times have you been at one of</p> <p>24 those functions?</p> <p>25 A. Under President George W. Bush?</p>	<p>12 bit earlier, I'm here representing President Obama and</p> <p>13 White House Press Secretary Robert Gibbs. When this</p> <p>14 lawsuit was first filed, as the Department of Justice</p> <p>15 attorney, I was representing President Bush and</p> <p>16 then-White House Press Secretary Dana Perino but, of</p> <p>17 course, there was a change in administration in January</p> <p>18 2009. We haven't met before today, have we?</p> <p>19 A. No.</p> <p>20 Q. Mrs. Dobson, are you a lawyer?</p> <p>21 A. No.</p> <p>22 Q. Do you have any legal training?</p> <p>23 A. No.</p> <p>24 Q. You testified earlier today a little bit about</p> <p>25 the National Day of Prayer statute. Are you familiar</p>
Page 171	Page 173
<p>1 Q. Any president. I won't ask how many that</p> <p>2 would be.</p> <p>3 A. I have no idea, because my husband has been on</p> <p>4 commissions with presidents.</p> <p>5 Q. So is it fair to say that you've been to the</p> <p>6 White House --</p> <p>7 A. Several times but not privately, always with a</p> <p>8 group.</p> <p>9 Q. Do you believe that the Bible is literally</p> <p>10 true word for word and is the inspired word of God?</p> <p>11 A. I do.</p> <p>12 MR. BOLTON: I think that's all I have.</p> <p>13 EXAMINATION</p> <p>14 BY MR. THERIOT:</p> <p>15 Q. Mrs. Dobson, I just had a couple of questions</p> <p>16 to clarify the record. With the original setting up of</p> <p>17 the National Day of Prayer Task Force, that was</p> <p>18 undertaken by the National Prayer Committee and</p> <p>19 Mrs. Bright; is that right?</p> <p>20 A. The initial, yes.</p> <p>21 Q. And you weren't involved in that whatsoever?</p> <p>22 A. No.</p> <p>23 Q. And then as far as you're aware, any funding</p> <p>24 from Focus on the Family for the task force didn't</p> <p>25 occur until after you became chairman; is that right?</p>	<p>1 with the specific language in that statute?</p> <p>2 A. I don't think we ever used the word "statute."</p> <p>3 Q. You are aware, of course, that there is a</p> <p>4 statute regarding the National Day of Prayer?</p> <p>5 A. Well, explain to me what you mean by</p> <p>6 "statute."</p> <p>7 Q. The law that Congress passed, for example, in</p> <p>8 1952.</p> <p>9 A. Yes, okay.</p> <p>10 Q. And then Congress passed another law in 1988.</p> <p>11 A. Yes.</p> <p>12 Q. Are you familiar with the specific language</p> <p>13 used in that law regarding the National Day of</p> <p>14 Prayer?</p> <p>15 A. I have read it, but I couldn't repeat it to</p> <p>16 you.</p> <p>17 Q. Have you reviewed the legislative history of</p> <p>18 that statute?</p> <p>19 A. Not really.</p> <p>20 Q. We discussed earlier the fact that in 2009,</p> <p>21 President Obama did not hold an event at the White</p> <p>22 House. And you were a bit disappointed by that?</p> <p>23 A. Yes.</p> <p>24 Q. We've also discussed at some length the event</p> <p>25 that was held in 2009 at the Cannon House office</p>



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<p>1 building. Can you just describe for me what took place 2 at that event?</p> <p>3 A. Well, it's a prayer service, and it's open to 4 the public, and we have a program. Every year we have 5 an honorary chairperson. This year it's Dr. Franklin 6 Graham. Last year it was Beth Moore. So the honorary 7 chairperson gives a message, and then we have 8 representatives that come over and represent, as I 9 said, the three branches of government plus the 10 military, and then sometimes we highlight sports, 11 sometimes we highlight media, and then we'll have 12 somebody from those areas come over and represent them. 13 And so -- and then we have some worship music, and it's 14 just a prayer service. It lasts from 9 to 12.</p> <p>15 Q. And actually that was the next question I was 16 going to ask, when the event at the Cannon House office 17 building took place. Did it wrap up at 12 p.m.?</p> <p>18 A. Yes.</p> <p>19 Q. Do you recall when President Obama issued his 20 2009 National Day of Prayer proclamation?</p> <p>21 A. All I know is that it got on the White House 22 Website at 3:00 on the National Day of Prayer.</p> <p>23 Q. Did you have access to the White House's 24 National Day of Prayer proclamation before 3:00?</p> <p>25 A. No.</p>	<p>1 Q. You testified earlier that -- and I don't have 2 exact notes on this, so clarify if I'm misstating this 3 in any way, that the National Day of Prayer Task Force 4 encourages individuals to pray?</p> <p>5 A. Yes.</p> <p>6 Q. Do you consider prayer to be a voluntary 7 activity?</p> <p>8 A. Yes.</p> <p>9 Q. So if somebody is inclined to pray, of course, 10 they can go ahead and pray, but if not, do you think 11 that the National Day of Prayer Task Force would 12 require them to pray in any way?</p> <p>13 A. We never require anybody to pray. It's 14 optional. We might request it, but we don't demand 15 it.</p> <p>16 Q. And there's no way that you could, of course, 17 demand it?</p> <p>18 A. No.</p> <p>19 Q. Because everybody has the right to express 20 their own religious views or the lack of their 21 religious views in their own manner?</p> <p>22 A. That's right.</p> <p>23 Q. I just had one last question. At the end of 24 Mr. Bolton's questioning, he asked about the number of 25 times that you visited the White House. Have you</p>
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<p>1 Q. Was that proclamation used at all during the 2 services at the Cannon House office building?</p> <p>3 A. It was too late to be used by the Cannon House 4 observance and by our coordinators and by anyone else. 5 I think it's the latest any president has ever written 6 a proclamation.</p> <p>7 Q. Now, if the Court, the District Court in this 8 case, were to strike down the National Day of Prayer 9 statute and were to order that the President could not 10 issue National Day of Prayer proclamations, could the 11 National Day of Prayer Task Force still coordinate 12 prayer events on the first Thursday in May of each 13 year?</p> <p>14 A. Yes.</p> <p>15 Q. And it could still call it the National Day of 16 Prayer, could it not?</p> <p>17 A. I don't know what the legal ramifications of 18 that are. If we're allowed to, yes, we could still 19 call it a National Day of Prayer, I imagine.</p> <p>20 Q. And, in fact, the fact that you had an event 21 at the Cannon House office building before the 22 President of the United States even issued a 23 proclamation would demonstrate that the National Day of 24 Prayer Task Force could still coordinate events?</p> <p>25 A. That's correct.</p>	<p>1 visited the White House at all since President Obama 2 took office?</p> <p>3 A. No.</p> <p>4 Q. Has your husband?</p> <p>5 A. No.</p> <p>6 MR. ROSENBERG: I think that's all I have. 7 Thank you very much.</p> <p>8 MR. BOLTON: Tom, are you there?</p> <p>9 MR. BELLAVIA: Yes, I am.</p> <p>10 MR. BOLTON: Did you want to ask anything?</p> <p>11 MR. BELLAVIA: No, I don't have any questions 12 Thanks.</p> <p>13 MR. BOLTON: Let me just ask one follow-up. 14 EXAMINATION</p> <p>15 BY MR. BOLTON:</p> <p>16 Q. Attorney Rosenberg asked whether you had any 17 legal training, and you said no. Would I be fair to 18 conclude that you don't wish to have any legal 19 training?</p> <p>20 A. This is the first time I've ever been deposed, 21 so no, no, I don't think that's in my future.</p> <p>22 MR. BOLTON: I'm just teasing you. Thank you 23 very much.</p> <p>24 MR. ROSENBERG: Thanks. 25 (The proceedings concluded at 2:30 p.m.)</p>

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## SIGNATURE OF WITNESS

I, SHIRLEY DOBSON, the witness in the above deposition, have read the within transcript of my testimony. I have made \_\_\_\_\_ changes in said testimony and have stated such changes (if any) and the reason for each change on a separate sheet attached to this transcript. My testimony as given herein is true and correct to the best of my knowledge and belief.

\_\_\_\_\_  
Shirley Dobson

Subscribed and sworn to before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Notary Public

My commission expires \_\_\_\_\_.

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## REPORTER'S CERTIFICATE

I, Connie S. Dyke, Register Professional Reporter and Certified Realtime Reporter, appointed to take the deposition of SHIRLEY DOBSON, do certify that before the deposition he was duly sworn by me to testify to the truth; that the deposition was taken by me at 8605 Explorer Drive, Colorado Springs, Colorado, on November 10, 2009, then reduced to typewritten form consisting of 179 pages herein; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not related to any party herein or their counsel, and have no interest in the result of this litigation.

In witness hereof, I have hereunto set my hand this 24th day of November, 2009.

\_\_\_\_\_  
Connie S. Dyke, RPR, CRR  
Notary Public

My commission expires June 28, 2010

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